Exhibit J1

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            IN THE UNITED STATES DISTRICT COURT
           FOR THE SOUTHERN DISTRICT OF NEW YORK
 4
    EASTERN PROFIT CORPORATION LIMITED,
 5
           Plaintiff/Counterclaim Defendant,
                      Case No. 18-cv-2185 (JGK)
 6
           -against-
7
    STRATEGIC VISION US, LLC,
 8
           Defendants/Counterclaim Plaintiff,
 9
                  -against-
10
    GUO WENGUI a/k/a MILES KWOK,
11
                       Counterclaim Defendant.
13
14
15
                       DEPOSITION OF
16
                       HAN CHUNGUANG
17
                     New York, New York
18
                     November 11, 2019
19
20
21
    ATKINSON-BAKER, INC.
    (800) 288-3376
23
   Www.depo.com
24 REPORTED BY: TERRI FUDENS
25 FILE NO: AD0B4F6
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1 2 3	IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK	1 2 3 4	I N D E X WITNESS: EXAMINATION BY: PAGES: Han Chunguang
4	X	5	Ms. Donnelli 5
5	EASTERN PROFIT CORPORATION LIMITED,	7	EXHIBITS
6	Plaintiff/Counterclaim Defendant,	8 9	DEFENDANT'S: DESCRIPTION: PAGES:
7	V. Case # 18-cv-2185 (JGK)	9	30 Notice of Change of Company 106 Secretary and Director
8	STRATEGIC VISION US, LLC,	10	(Appointment/Cessation) Bates
9	Defendants/Counterclaim Plaintiff.	11	stamped EASTERN-000400 to 402
10	V		31 A piece of yellow paper 109
11	GUO WENGUI a/k/a MILES KWOK,	12	containing the witness' name
12	Counterclaim Defendant.	13	handwritten three times
	X		32 A two-page document titled 109
13		14	Limited Power of Attorney
14		15	Bates stamped EASTERN-000276 and 277
15	Deposition of HAN CHUNGUANG, a Non-Party	16	A document titled Substitution 118
16	Witness, taken by the Defendant-Counterclaim	17	of Counsel consisting of two
17	Plaintiff pursuant to Court Order held at 620	18	pages 34 A document titled Research 119
18			Agreement dated December 29,
19	Eighth Avenue, New York, New York, commencing at	19	2017 Bates stamped
	10:03 A.M., Monday, November 11, 2019, before	20	EASTERN-000005 to 000009
20	Terri Fudens, a Stenotype Reporter and Notary		35 A document titled Loan 124
21	Public of the State of New York.	21	Agreement Bates stamped EASTERN-000278 to 280
22		22	LASTERNY-000276 to 200
23			A black and white photograph 153
24		23	of five people
25		25	* * * *
	Page 2		Page 4
1 2	APPEARANCES:	1	HAN CHUNGUANG
3	PEPPER HAMILTON LLP	2	ANN CHI HO, the Interpreter, was duly sworn by
4	Attorneys for Plaintiff/Counterclaim	3	Terri Fudens, a Notary Public of the
4	Defendant - Eastern Profit Corporation, Ltd. 1313 North Market Street	4	State of New York, to accurately
5	Suite 5100	5	translate the following questions and
6	Wilmington, Delaware 19801	6	answers to the best of her ability.
0	BY: CHRIS CHUFF, ESQ.	7	HAN CHUNGUANG, a Non-Party witness
7	21. Cilias Ciori, 25Q.	8	herein, having been first duly sworn
8	OD 11/FG 01005FFF 11/G	9	by Terri Fudens, a Notary Public of
9	GRAVES GARRETT LLC Attorneys for Defendant/Counterclaim	10	the State of New York, was examined
	Plaintiff - Strategic Vision US LLC	11	and testified as follows:
10	1100 Main Street, Suite 2700	12	
11	Kansas City, Missouri 64105 816.2563181	13	EXAMINATION BY
12	BY: EDWARD D. GREIM, ESQ.		MS. DONNELLI:
1.0	edgreim@gravesgarrett.com	14	Q Please state your name for the
13	JENNIFER DONNELLI, ESQ.	15	record.
14	jdonnelli@gravesgarrett.com	16	A Chunguang Han. My last name is Han.
15		17	My first name is Chunguang.
16	GOLDEN SPRING (NEW YORK) LTD. In-House Counsel for Golden Spring	18	MR. CHUFF: Chris Chuff for
17	162 E. 64th Street	19	Eastern Profit Corporation Limited
1.0	New York, New York 10065	20	and the witness.
18 19	917.941.9698 BY: DANIEL PODHASKIE, ESQ.	21	MS. WANG: Yvette Wang from
20	D. DANIEL I ODINOME, EDQ.	22	Golden Spring, New York, Ltd.
21	ALSO PRESENT:	23	MR. PODHASKIE: Daniel Podhaskie
22 23	French Wallop	24	
	Michael Waller		with Golden Spring, New York, Ltd.
24	Yvette Wang		
24 25	Ann Chi Ho, Interpreter	25	MS. DONNELLI: Eddie Greim and
		25	MS. DONNELLI: Eddie Greim and Page 5

1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	keep my questions as focused on those	this unless the court directs us to
3	topics as I can. But there's come	and aniess the court ancets as to
4		uo 30.
5	background that I think is necessary	110. BOTTTELLI. We'll William
	to place this witness in the context	and question
6	of those questions. I will try to	6 MR. CHUFF: Thank you.
7	keep it focused. I do have some	⁷ Q When you were living in China, did
8	background.	8 you begin working for Eastern Profit?
9	MR. CHUFF: Why is where he was	⁹ A Okay. When I was working for this
10	born relevant to the contract claim?	company, it was in 2017. No. No. No. It was in
11	MS. DONNELLI: Well that's, I	¹¹ 2015 or 2016. That's right.
12	think, in part to make the witness	Q Were you living in the United States
13	sort of comfortable with getting to	13 in 2015 or 2016?
14	know me and I'm getting to know him.	A Not yet. At the time I was in Hong
15	MR. CHUFF: Okay.	15 Kong.
16	MS. DONNELLI: I will probably	16 Q When did you begin living in the
17	have questions about his time here in	17 United States?
18	relation to the documents that he	18 A In 20 I'm not sure, but I have
19	signed. So I want to kind of place	been here for several years already.
20	his local where he was at certain	
21		Q Were you performing a role for
22	times.	Lasterii Fone Wille you were living in the office
23	MS. WANG: Can you please	22 States?
	translate, madam translator.	A I am an agent for them.
24	MS. CLINE: Thank you.	Q Were you an agent for Eastern Profit
25	Q I believe the question was where were	while you have been living in the United States?
	Page 10	Page 12
	1.050.10	1 48 12
1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	_	
i -	you born.	A Before June, 2017 I was a director of
3	you born. A In China.	
	A In China.	A Before June, 2017 I was a director of this company. However, in July that year, I
3	A In China. Q Where in China?	A Before June, 2017 I was a director of this company. However, in July that year, I transferred it to Guo Mei ask me to be an agent
3 4	A In China. Q Where in China? A Shandong. S-H-A-N-D-O-N-G.	A Before June, 2017 I was a director of this company. However, in July that year, I transferred it to Guo Mei ask me to be an agent for this company after the transfer.
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A In China. Q Where in China? A Shandong. S-H-A-N-D-O-N-G. Q What brought you to the United States? MR. CHUFF: Objection. I'm not going to allow the witness to testify about this. The court has already ordered that personal history and reasons for coming to the United States is clearly beyond the scope of relevancy to these proceedings. And I'm not going to allow him to answer without the court ordering us to do so. I direct you to Docket 189, page 7 where it says personal history and reasons for coming to the United States, defendant has not demonstrated the relevance of this topic. So we're not going to allow the	A Before June, 2017 I was a director of this company. However, in July that year, I transferred it to Guo Mei ask me to be an agent for this company after the transfer. Q Before June, 2017, were you living in the United States? A I think so. Q Have you lived in the United States since June of 2017 and nowhere else? A I am not sure, but I think I have been moving around. Q Within the United States? A Yes. Q Have you been back to China since June of 2017 for any extended period? MR. CHUFF: Objection to form. Again, I'm going to cut this off soon. It's not relevant to the issues that the court allowed your side to proceed on. A No. Q Where do you currently live? A In United States.

			1
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	A New York.	2	it to you. But the court was very
3	Q What street?	3	clear that he had limited involvement
4		4	
5	MR. CHUFF: Objection.	5	in issues in this case and has to be
6	Relevance and that's beyond the scope	6	focused on the power of attorney, the
7	of what the court allowed.	7	ACA loan and the Strategic Vision
	MS. DONNELLI: The court didn't		Research Agreement.
8	make an order about this witness.	8	MS. DONNELLI: And that was an
9	The court made an order about	9	order entered upon a representation
10	Mr. Guo.	10	by your side of things about what
11	Besides, at the most recent	11	this witness knew. And at our last
12	deposition, which was of Eastern	12	deposition, which I know you didn't
13	Profit, the litigant, we heard	13	attend
14	testimony that this witness has	14	MR. CHUFF: But I read.
15	involvement with Eastern Profit,	15	MS. DONNELLI: but you read,
16	significant involvement. So I'm	16	you will agree that there was
17	exploring where he was located.	17	testimony that this witness had
18	MR. CHUFF: You have the city.	18	significant involvement with Eastern
19	Why do you need the street address?	19	Profit.
20	MS. DONNELLI: I routinely ask	20	MR. CHUFF: I would not agree
21	witnesses what their street address	21	that there was any testimony that he
22	is.	22	had significant involvement. Again,
23	MR. CHUFF: I just don't see how	23	I don't think his street address is
24	it's relevant.	24	relevant.
25	MS. DONNELLI: If you're going	25	MS. DONNELLI: The testimony is
20	MS. DOMNELLI. II you're going	25	MS. DOMNELLI. THE LESUITIONY IS
	Page 14		Page 16
-			
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	to instruct him not to answer, that's	2	he was the boss of Eastern Profit.
3	one thing. But I caution you that	3	So anyway, I think it's relevant to
4	that's a very common question to ask	4	understand where this witness resides
5	of a witness.	5	so that we can see where he is at in
6	MR. CHUFF: We've agreed to	6	relation to entities that have an
7	produce him at trial already. So you	7	association with Eastern Profit.
8	don't need to serve him with	8	MR. CHUFF: Until you've
9	anything. It's beyond the scope.	9	achieved that, I'm not going to allow
10	MS. DONNELLI: I'm trying to	10	
1 11	ris. Donnelli. Till dyling to	10	him to answer about his street
11		11	
12	understand the context of where he's		address.
	understand the context of where he's doing his work for this entity and to	11	address. MS. DONNELLI: You're not going
12	understand the context of where he's doing his work for this entity and to be able to understand where he lives.	11 12	address. MS. DONNELLI: You're not going to allow him to answer his street
12 13	understand the context of where he's doing his work for this entity and to be able to understand where he lives. The time frame in question is	11 12 13	address. MS. DONNELLI: You're not going to allow him to answer his street address?
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1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	believe this witness has a	2 know, what he might know about
3		know, what he might know about
4	relationship with that witness. So I	arry arm g and ever yearing in the
	ask if the witness will answer the	diliverse that relates to
5	question.	5 MS. DONNELLI: Counsel, you just
6	MR. CHUFF: I'm instructing him	feed that again for a second time.
7	not to answer. This is not relevant	7 You're obstructing this deposition.
8	to any of the issues, and the court	8 MR. CHUFF: That's exactly what
9	has been very clear that this has to	⁹ you're doing. I'm not wasting my
10	be a very narrow deposition with his	10 time.
11	involvement with the issues in this	MS. DONNELLI: You read that
12	case. And this has nothing to do	twice and I asked you to not obstruct
13	with the contracts at issue.	the deposition. I'm surprised that
14	MS. DONNELLI: You haven't even	you are frankly, but you are.
15	let me establish where it might go.	MR. CHUFF: I'm surprised that
16	You're just instructing the witness	after I read it the first time you're
17	not to answer.	still asking these questions.
18		18 MS. DONNELLI: Let's just move
19	MR. CHUFF: Explain it to me,	1 10
20	because I'm not seeing the relevance.	0111
21	MS. DONNELLI: Because we	Q Do you know a dao wengan.
	believe that that is an address	Λ 165.
22	connected with Guo Wengui, and we	Q How do you know that name?
23	think that this witness has a	A In 2009 I went to visit Mr. Guo
24	relationship with Guo Wengui that is	Wengui not Guo Pangu because of his
25	deeper than perhaps your objections	²⁵ representation.
	Page 22	Page 24
	1 age 22	1 age 24
1	HAN CHUNGUANG	1 HAN CHUNGUANG
		I + DAN COUNCIDANG
2		TIAN CHONGOANG
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3	are intended to convey. So you're not even letting me	2 Because of my adoration for him, I 3 learned investment architecture, art and
3 4	are intended to convey. So you're not even letting me get into anything, and you're	2 Because of my adoration for him, I 3 learned investment architecture, art and 4 everything else from him, Pangu.
3 4 5	are intended to convey. So you're not even letting me get into anything, and you're instructing a witness not to answer,	Because of my adoration for him, I Because of my ad
3 4 5 6	are intended to convey. So you're not even letting me get into anything, and you're instructing a witness not to answer, a fact witness not to answer. And	Because of my adoration for him, I Because of my adoration for him, I learned investment architecture, art and everything else from him, Pangu. Q Was Mr. Guo your mentor? A Yes. A mentor.
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2	Netherlands location with Mr. Guo?	2	then ask more specific questions.
3	MR. PODHASKIE: Objection to	3	Are you still instructing this
4	form.	4	
5	A No.	5	witness, a fact witness, not to answer?
6		6	
	Q Has Mr. Guo ever employed you?		MR. CHUFF: Can you repeat the
7	A Did Mr. Guo employ me? What do you	7	question?
8	mean by that?	8	(The requested portion of the
9	Q Have you performed any jobs for	9	record was read back by the
10	Mr. Guo for which you have been paid?	10	reporter.)
11	A No.	11	MR. CHUFF: I withdraw the
12	Q Have you received any form of	12	instruction not to answer that
13	compensation from Mr. Guo?	13	question.
14	A No.	14	(The requested portion of the
15	Q Over the last year, how often have	15	record was read back by the
16	you seen Mr. Guo, meaning every day, once a month?	16	reporter.)
17	MR. CHUFF: Okay. Objection.	17	A I don't think this question has
18	Apparently I have to read the	18	anything to do with this case; right?
19	transcript the third time. This is	19	Q The counsel today for you has
20	exactly what the court said you may	20	instructed you to answer.
21	not delve into. I'm not allowing the	21	MR. CHUFF: I withdrew my
22	witness to answer it.	22	instruction not to answer.
23		23	A I have followed Mr. Guo for a long
24	Q Under what context have you seen	24	time.
25	Mr. Guo over the last year?	25	
23	MR. CHUFF: Unless it's related	25	Q For what purpose?
	Page 26		Page 28
	-		
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2			
	to Eastern Profit or the contracts at	2	
3	to Eastern Profit or the contracts at issue in this case. I direct you not	2 3	A Again, I learned things from him. I
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	MR. CHUFF: I'm sorry.	2	You're instructing this witness
3	Objection. What Mr. Han is learning	3	not to answer a question about this
4		4	
5	from Mr. Guo has nothing to do with	5	witness' testimony to a question.
6	any of the issues.	6	You allowed him to answer.
	MS. DONNELLI: Why don't you		MR. CHUFF: I'm not allowing
7	make an objection for the record.	7	you to explore his relationship with
8	MR. CHUFF: I'm explaining why	8	Mr. Guo that has nothing to do
9	I'm instructing him not to answer	9	with
10	these questions.	10	MS. DONNELLI: It is a yes or no
11	MS. DONNELLI: All right. Why	11	question I've asked you.
12	don't you just instruct him not to	12	MR. CHUFF: Okay. I'm going to
13	answer, because this whole process is	13	give you my answer. I'm instructing
14	obstructing this deposition. So why	14	the witness not to answer a question
15	don't you instruct him not to answer.	15	that is beyond what the court ordered
16	There's no need to go further than	16	him to appear for. And it's not
17	that. We'll take it up with the	17	related to Eastern Profit or the
18	judge.	18	contracts at issue in this case. His
19	MR. CHUFF: It's beyond the	19	relationship with Mr. Guo, outside of
20	scope of what the court ordered.	20	this case, has nothing to do with
21	MS. DONNELLI: This whole	21	anything.
22	process is obstructing this	22	MS. DONNELLI: Well, counsel,
23	deposition.	23	your witness here has already
24	So why don't you instruct him	24	testified that he had a role with
25		25	
2.5	not to answer. There's no need to go	25	Eastern Profit, and I'm entitled to
	Page 30		Page 32
1		1	
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	further than that. We'll take it up	2	understand if investment was relating
3	with the judge.	3	to that.
4	MR. CHUFF: I instruct him not	4	MR. CHUFF: You asked him about
5	to answer.	5	his mentorship relationship with
6	Q Do you pay Mr. Guo to teach you about	6	Mr. Guo. He said he's learning
7	investment?	7	investments. You're asking about
8	MR. CHUFF: Objection.	8	what investments.
9	Relevance. Beyond the scope of the	9	MS. DONNELLI: There's nothing
10	order. I instruct him not to answer.	10	improper about that.
11	MS. DONNELLI: So you're going	11	MR. CHUFF: You're not asking
12	to instruct the witness not to answer	12	Eastern Proffit's investments.
13	a question that follows up on the	13	You're asking about what he's
14	very words the witness used to a	14	learning from Mr. Guo. That's
15	question you allowed. I want to be	15	completely improper and it's a
16	sure I understand your position.	16	fishing expedition beyond the scope
17	The witness testified to this	17	of what the court ordered.
18	information. I'm asking him about	18	Q Do the investment matters that
19	it.	19	Mr. Guo teaches you about involve Eastern Profit?
20	MR. CHUFF: I tried to give you	20	A No.
21	some leeway, but this is completely	21	Q You testified that Mr. Guo teaches
22	irrelevant and contrary to what the	22	you how to do things. Do those things involve
23	court ordered about the deposition.	23	Eastern Profit?
24	MS. DONNELLI: I want to make	24	A No. What Mr. Guo taught me was to
1		25	give me a direction. He didn't teach me anything
25	sure I understand.	20	give the a direction. He didn't teach the anything
25	sure 1 understand. Page 31		Page 33

1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	specific.	2	A The business is a family trust.
3	Q Have you ever discussed Eastern	3	Therefore, I would say I've been working for it
4	Profit with Mr. Guo?	4	for a long time.
5	A No.	5	Q Since you've been in the United
6	Q Does the address 162 East 64th	6	States?
7	Street, New York City mean anything to you?	7	A Yes.
8	A I have heard about it.	8	Q Does it have any involvement with
9	Q What do you understand it to be?	9	Eastern Profit?
10		10	A No.
11		11	Q Is the name of the company Golden
12	to meet Yvette and discussed about paying back a	12	Spring New York Limited?
13	loan.	13	
	Q A loan to whom?	14	A I don't understand your question.
14	A I borrowed money from William, and	15	Can you rephrase your question?
15	William was asking me to pay him back. That was	16	Q Does a company called Golden Spring
16	the matter I brought it up with Yvette in the	17	New York employ you?
17	lobby of this building.		A No.
18	Q Did you or Eastern Profit borrow the	18	Q Has that company ever employed you?
19	money you're referring to?	19	A No. But again, I'm not sure. My
20	A The company did.	20	recollection is not clear.
21	Q How often do you meet with Mr. Guo	21	Q Has a company called Golden Spring
22	for him to mentor you and teach you how to do	22	Hong Kong Limited ever employed you?
23	things?	23	A No.
24	MR. CHUFF: Objection. For the	24	Q If I represented to you that Golden
25	reasons I've already discussed, I	25	Spring New York Limited employed Yvette Wang,
	D 24		D 26
	Page 34		Page 36
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	instruct the witness not to answer	2	would that refresh your recollection whether it
3	unless counsel can direct it to some	3	has employed you?
4	kind of relevance to Eastern Profit.	4	A I did ask Yvette to do something for
5	Q Do you know who Guo Mei is?	5	me. And she is or was involved with Golden Spring
6	A Yes.	6	New York.
7		7	THE INTERPRETER: Interpreter
8	Q Is Guo Mei Mr. Guo's daughter?	8	note in Chinese we don't have a
9	A Yes. Q Does Guo Mei have a relationship with	9	tense. In China no present, or past,
10	- · · · · · · · · · · · · · · · · · · ·	10	
11	Eastern Profit?	11	or future things.
12	A Guo Mei is a director of Eastern	12	Q When you met with Yvette Wang to discuss a loan, was she there personally or for
1 /.		1 14	discuss a man, was sne there personally or for
	Profit right now.	1 2	
13	Q Have you ever discussed Guo Mei's	13	Golden Spring New York?
13 14	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo?	14	Golden Spring New York? A She represented the company.
13 14 15	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a	14 15	Golden Spring New York? A She represented the company. Q Golden Spring New York?
13 14 15 16	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a discussion with Mr. Guo.	14 15 16	Golden Spring New York? A She represented the company. Q Golden Spring New York? A Yes.
13 14 15 16 17	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a discussion with Mr. Guo. Q Do you have a job at this time?	14 15 16 17	Golden Spring New York? A She represented the company. Q Golden Spring New York? A Yes. Q Why would you be speaking with Golden
13 14 15 16 17	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a discussion with Mr. Guo. Q Do you have a job at this time? A Do I have a job right now? Yes.	14 15 16 17 18	Golden Spring New York? A She represented the company. Q Golden Spring New York? A Yes. Q Why would you be speaking with Golden Spring New York about a loan?
13 14 15 16 17 18 19	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a discussion with Mr. Guo. Q Do you have a job at this time? A Do I have a job right now? Yes. Q Where are you employed?	14 15 16 17 18 19	Golden Spring New York? A She represented the company. Q Golden Spring New York? A Yes. Q Why would you be speaking with Golden Spring New York about a loan? A It is not like I was speaking to
13 14 15 16 17 18 19 20	Q Have you ever discussed Guo Mei's role with Eastern Profit with Mr. Guo? A No. I have never had such a discussion with Mr. Guo. Q Do you have a job at this time? A Do I have a job right now? Yes. Q Where are you employed? A I work for my own company.	14 15 16 17 18 19 20	Golden Spring New York? A She represented the company. Q Golden Spring New York? A Yes. Q Why would you be speaking with Golden Spring New York about a loan? A It is not like I was speaking to Golden Spring New York. I was speaking
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HAN CHUNGUANG Q Y to usstiffed about meeting yvette with her biothy to discuss a loan. A What's your question? I won't qualify the discussion as a meeting. I chatted with her briefly. Q When you say briefly, how long was it? A A round 20 minutes at the most. 20 some minutes. Q Was anyone else present besides you and Yvette? A A Ro. Q How did you know to meet with Yvette? A I don't understand her question. What do you mean how did I know to meet with Yvette? Q Why did you meet with Yvette rather than Mr. Guo? A That day I went there to see Mr. Guo who stayed there at the time. I Dumped into Yvette with the William was asking me to pay back a loan, and I Chatted with her briefly. Q Why did you think that Yvette knew Pags 38 A I don't understand your question. What do you mean? A I short understand your question. What do you mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What when I bimped into Yette, the was understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What doy our mean? A I short understand your question. What			_	
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16 Q Why did you choose Yvette to tell 17 this to? 18 A By the way, can I go to the bathroom 19 first. 20 Q In a few minutes we will take a 21 break, but please answer the question. 22 A Can you repeat your question? 23 (The requested portion of the reporter.) 24 reporter.) 26 Q We are here after taking a break. 17 Is Golden Spring New York's business 18 office located at 162 East 64th Street? 19 A I don't know. 20 Q Why were you able to meet Yvette Wong in that building if that's not where Golden Spring 21 New York does its business? 22 A I don't understand your question. 23 A I don't understand your question. 24 Yvette in that building, and I'm asking what				
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18 A By the way, can I go to the bathroom 19 first. 20 Q In a few minutes we will take a 21 break, but please answer the question. 22 A Can you repeat your question? 23 (The requested portion of the record was read back by the reporter.) 24 reporter.) 28 A By the way, can I go to the bathroom 19 office located at 162 East 64th Street? 19 A I don't know. 20 Q Why were you able to meet Yvette Wong in that building if that's not where Golden Spring 21 New York does its business? 22 A I don't understand your question. 23 Q You testified that you bumped into 24 Yvette in that building, and I'm asking what				
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A Can you repeat your question? (The requested portion of the record was read back by the reporter.) New York does its business? A I don't understand your question. Q You testified that you bumped into Yvette in that building, and I'm asking what		· ·		
(The requested portion of the record was read back by the reporter.) 23				
record was read back by the 25 reporter.) 24 Q You testified that you bumped into 25 Yvette in that building, and I'm asking what				
reporter.) 25 reporter.) 25 Yvette in that building, and I'm asking what				
reporterly rected in that building, and 1111 doking what		record was read back by the	24	
Page 39 Page 41	25	reporter.)	25	Yvette in that building, and I'm asking what
Page 39 Page 41				
		Daga 20	I	Page 41

1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	caused her to be in that building.	² Eastern Profit?
3	A I don't know. You have to ask her.	³ A Yes. I got permission from Guo Mei,
4	It happened that I bumped into her that day, and I	and I authorized Yvette to handle this particular
5	talked to her about this matter. That was it.	5 matter for me, which was a matter of hiring and
6	You have to ask her why.	6 investigation company.
7	Q Where is your place of work located?	7 Q Is that the only involvement that
8	A My place of work?	8 Yvette had with Eastern Profit?
9	Q Yes.	9 A I'm so sorry. Can you repeat your
10	A I'm not at liberty to disclose that	10 question.
11	here.	11 (The requested portion of the
12	Q Is your place of work 162 East 64th	record was read back by the
13	Street?	reporter.)
14	A No.	A In terms of all matters related to
15	Q Why are you not at liberty to	the investigation company, I gave my authorization
16	disclose your place of work?	to Yvette so that she could act on my behalf.
17	MR. CHUFF: Objection. Form.	Q Did Yvette do anything for Eastern
18	A What I'm concerned is that once my	Profit other than related to the investigation
19	information is revealed, the communist party will	19 company?
20	also learn about it too.	A No. No, because this company of mine
21	Q Is your place of work the same place	was frozen in Hong Kong and that was all I asked
22	of work of the family trust?	her to do for me.
23	A Your question is rather vague. I	Q Going back to this meeting that you
24	don't know how to answer your question.	had with Yvette at 162 East 64th Street, when did
25	MS. DONNELLI: Can you read the	²⁵ it occur?
	2 0 7 0 7 0 7 0	14 00001.1
	Page 42	Page 44
1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	question back.	A Several months ago, I think.
3	(The requested portion of the	Q In the year 2019?
4 5	record was read back by the	4 A Yes.
	reporter.)	Other than that meeting, did you ever
6	A In terms of her question, I don't	speak with or communicate with Yvette about the
7 8	know how to answer it.	louit:
9	Q When you performed things for Eastern	A Tuon Cremember.
10	Profit, did you do that at 162 East 64th Street?	Q The Work that you currently do for
11	A No.	the farmy drust, is that the type of work you are
12	Q Where were you located when you	Tor Edstern Fronce
13	performed the things you did for Eastern Profit?	, i juilly on the year queetien is related
14	A The headquarter of this company was	to what my family trust is doing, I am not at
	in Hong Kong. However, I could choose anywhere I	liberty to answer your question here.
15	wanted to work for this company. I was quite	Q Willy Hot.
16 17	free.	A Again, I'm concerned about my safety.
	Q Where did you choose to do your work	17 If I reveal too much information about myself, the
18	for Eastern Profit?	communist party eventually will also learn about
19 20	A When I took over this company, I was	19 it too. 20 O You called this your Y-O-LI-R family
	in Hong Kong.	Q Tod called this your, 1 o o it, fairing
21	Q Did you perform any work for Eastern	trust. Is it the Han Family Trust that you work
22	Profit anywhere other than Hong Kong?	22 for?
23	A In New York, I asked Yvette to do	A My answer will be the same as what I
24	thing for me on behalf of this company.	have given to you, to your previous answer to
25	Q When you say "this company," you mean	25 your previous question.
	£	,

		1	1
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Q You testified that you had to get	2	A I think she was in New York, but I'm
3	permission from Guo Mei to authorize Yvette to do	3	not sure. Basically I had a phone conversation
4	things for Eastern Profit.	4	with her, or I had phone conversations with her.
5	MR. CHUFF: Objection to form.	5	I was not sure where she was.
6	Q Why did Guo Mei not simply go	6	THE INTERPRETER: Interpreter
7	directly to Yvette rather than through you?	7	note in Chinese we don't have a
8	A Guo Mei was very busy. Guo Mei gave	8	singular or plurals. Therefore the
9		9	interpreter does not know how many
10	me the authorization to handle things for her, and	10	phone conversation had with Miss Guo.
11	then I give the authorization to Yvette to do	11	•
12	things for me. It was very logic. This was the	12	Q When were the phone conversations?
13	way I did my business.	13	A In 2017. Also in 2018. There were
	Q Was any of the instruction that	14	phone conversations in recent years.
14	Mr. Guo gave you about investments helpful to you	15	Q Can you be more specific as far as
15	in your role with Eastern Profit?	16	even a month in those years?
16	MR. CHUFF: Objection. Form.		A Again, I don't remember the
17	A Yes. He has been teaching me a lot.	17	specifics. But I do remember in last few years I
18	He has given me knowledge. And whatever I learn	18	spoke with her over the phone.
19	from him I'll apply it to the rest of my life to	19	Q Were you working for the family trust
20	apply it to my company, to apply it to my business	20	when you spoke with Guo Mei about this?
21	model.	21	A Yes. Continually.
22	Q Why did you not apply it to Eastern	22	Q Why did you not choose someone from
23	Profit and instead got Yvette involved?	23	the family trust to help you rather than choosing
24	MR. PODHASKIE: Objection to	24	Yvette?
25	form.	25	A This was due to a business
	Page 46		Page 48
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	A Firstly, my English is not great. I	2	consideration.
3	need someone in New York to help me. Therefore, I	3	Q Which was what?
4	authorize Yvette to handle things for me. It was	4	A This is rather personal. I don't
5	as simple as that.	5	think I should tell you my business' strategies
6	Q When you say handle, I understood you	6	was. I don't think I want to review it here.
7	to mean that Yvette had your full authority. Do	7	Q Did you have personal interests in
8	you mean something less than that?	8	Eastern Profit?
9	A I got full authorization to Yvette to	9	MR. CHUFF: Objection. Form.
10	handle the matters was this liar company.	10	A When you say personal interest, what
11	Q You testified that Guo Mei authorized	11	do you mean by that?
12	you. Was that authorization in writing?	12	Q I was trying to understand your
13	A What do you mean, written	13	answer, why something on a personal level affected
14	authorization?	14	your decision for Eastern Profit.
15	Q Yes.	15	A I still don't understand your
16	A No. Orally.	16	question. What do you mean that my personal way
17	Q Where was Guo Mei located when she	17	of thinking affected my involvement with the
18	gave you the permission to authorize Yvette to	18	company?
19	undertake things that we've discussed?	19	Q We will get to that more later.
20	MR. CHUFF: Objection. Form.	20	Does the address 800 Fifth Avenue,
21	THE INTERPRETER: The	21	Suite 21F mean anything to you?
22	interpreter needs clarification from	22	A No.
23	the witness to repeat last sentence	23	Q We've been speaking about an entity
24	because the interpreter did not hear	24	called Eastern Profit; true?
25	it clearly.	25	A Yes.
	,		D 40
	Page 47	1	Page 49

1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	Q What is the full name of that entity?	2 did everything in a legal sense?
3	A Eastern Profit.	3 MR. CHUFF: Objection. Form.
4	Q Do you know that entity to have any	4 A Yes. When I purchased this company
5	other names?	5 for my friend, I was going to use it to do
6	A I'm not sure.	6 investment business. Of course I wanted to do it
7		investment business. Of course I wanted to do it
8		right. I wanted to do it legally. I wanted to do
9	entity's name is Eastern Profit; correct?	ie in Sound Business.
10	A Yes.	Q What review of rescarch and you do
	Q No other words in its name; correct?	before purchasing Eastern Profit to assure
11	A No.	yourself that it had, in fact, done things
12	Q When was Eastern Profit formed?	legally?
13	A I acquired it somewhere around the	A I was to acquire this company. I did
14	end of 2014. I purchased it for someone, but I	some analysis and performance evaluation. I did
15	didn't know whether the company had another name	it also based upon my experience. By the way, it
16	or not before my purchase of it.	was a company legally listed. Why would it not do
17	Q When was your purchase of Eastern	¹⁷ things legally?
18	Profit?	18 Q Did Mr. Guo provide you guidance or
19	A I think the end of 2014.	advice when you were reviewing Eastern Profit to
20	Q Had you had any involvement with	²⁰ purchase it?
21	Eastern Profit prior to the end of 2014?	A No, not anything specific.
22	A No.	Q Did you inform Mr. Guo that you were
23	Q Who did you acquire it from?	intending to purchase Eastern Profit before you
24	A From a friend of mine.	24 purchased it?
25	Q What was the name of the friend?	25 A No.
	Page 50	Page 52
1	HAN CHINGIANG	1 HAN CHUNGUANG
1 2	HAN CHUNGUANG A The last name Xu, X-II, 7-H-A-O	1 HAN CHUNGUANG 2 O Did Mr. Guo provide you the
2	A The last name Xu, X-U. Z-H-A-O,	2 Q Did Mr. Guo provide you the
2	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U.	 Q Did Mr. Guo provide you the compensation needed to purchase Eastern Profit?
2 3 4	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The	Q Did Mr. Guo provide you the compensation needed to purchase Eastern Profit? A No.
2 3 4 5	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The interpreter is spelling, which may	2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your
2 3 4 5 6	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The interpreter is spelling, which may not be the official spilling.	2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your 6 analysis and evaluation, did you review any
2 3 4 5 6 7	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The interpreter is spelling, which may not be the official spilling. MS. DONNELLI: Thank you.	2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your 6 analysis and evaluation, did you review any 7 written materials from Eastern Profit?
2 3 4 5 6 7 8	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The interpreter is spelling, which may not be the official spilling. MS. DONNELLI: Thank you. Q Why did you purchase Eastern Profit?	2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your 6 analysis and evaluation, did you review any 7 written materials from Eastern Profit? 8 A At the time in Hong Kong I had an
2 3 4 5 6 7 8	A The last name Xu, X-U. Z-H-A-O, H-U-I, X-U. THE INTERPRETER: The interpreter is spelling, which may not be the official spilling. MS. DONNELLI: Thank you. Q Why did you purchase Eastern Profit? A At the time I had just got to Hong	2 Q Did Mr. Guo provide you the 3 compensation needed to purchase Eastern Profit? 4 A No. 5 Q When you were performing your 6 analysis and evaluation, did you review any 7 written materials from Eastern Profit? 8 A At the time in Hong Kong I had an 9 agent. I had this agent of mine to do all the
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Page 55 Page 57				dansiation, miles may not be the
	1	Page 55		Page 57

1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	official address.	2	did not need anyone to select it for me.
3	Q Has that always been Eastern Profit's	3	Q Did you sign any written document to
4	business address?	4	make yourself director of Eastern Profit?
5		5	
	MR. CHUFF: Objection.	6	A Yes.
6	Foundation.		Q Did you become a director of Eastern
7	A When you say that had this address	7	Profit at the same time you purchased it?
8	been the business address of Eastern Profit, what	8	A Yes.
9	do you mean by that?	9	Q What was the business of Eastern
10	Q I understood you testified that	10	Profit when you purchased it?
11	Eastern Profit had a business location. Is that	11	A Investment.
12	true?	12	Q Did that purchase change over time?
13	A Yes.	13	A No. No. It had not.
14	Q Where is Eastern Profit's business	14	Q Was the amount that Eastern Profit
15	location?	15	invested the amount that you used to purchase
16	A You asking me the company address;	16	Eastern Profit in the first instance?
17	right? The company address was Bank of China	17	Where did the fund come from that
18	Building, 49th floor.	18	Eastern Profit used to make an investment?
19	Q Was that always Eastern Profit's	19	A For my family fund.
20	address since you purchased it?	20	Q Is that the family fund you work for
21	A Yes.	21	today?
22		22	1
23	Q Have you been there?	23	
24	A Yes, I did.	24	Q Who at the family fund did you work
25	Q When was that?	25	with to get the funds transferred so that Eastern
23	A Wow. It was several years ago.	23	Profit could make investments?
	Page 58		Page 60
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Q How many times have you been to	2	MR. CHUFF: Objection to form.
3	Eastern Profit's office?	3	A This has nothing to do with this
4	A Consent times		
	A Several times.	4	
5		4 5	case, and this question, it's very proven to my
5 6	Q When you purchased Eastern Profit,		case, and this question, it s very proven to my privacy. I don't want to answer it.
	Q When you purchased Eastern Profit, did it have any other owners?	5	case, and this question, it svery proven to my privacy. I don't want to answer it. Q To put it in a timeframe, you became
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	would accept the correction.	2	Q Was it the athletic school of Lunan?
3	A I formed a three year college.	3	A I'm not familiar with the name you
4	Secondly, Mr. Guo has been teaching me a lot.	4	pronounced. Lunan? I'm not family with it, is
5	Thirdly, I love to read books. Have educated me a	5	
6		6	the way you read it.
7	lot. Fourthly, society was also a good teacher	7	Q Did you receive a degree in athletics
8	that taught me a lot.	8	from your education?
	Q What educational institution gave you	9	A Yes. I went to an athletic school.
9	the degree after the three years of college?		Q Is that where you received your
10	A It was Chinese school.	10	degree from?
11	Q What was the name?	11	A In terms of a degree, I always got
12	A This question is very specific. I	12	certificate from each level of school. I attended
13	don't think I want to answer such a specific	13	an elementary, from junior high to high school,
14	question.	14	and from technical secondary school.
15	Q It is a very common question to be	15	Q The secondary school was the same
16	asked where you received a degree from, so please	16	thing as the technical school; correct?
17	answer the question.	17	A I'm not sure. But in Chinese it is
18	A For me this question very specific.	18	called technical secondary school.
19	This is a very private no, I don't mean very	19	Q The degree you received from the
20	private. I just think this question has nothing	20	technical secondary school was in athletics;
21	to do with this case. I don't feel that I should	21	correct?
22	answer this question.	22	A Yes. Yes. That's why.
23	Q Are you concerned about answering the	23	Q Have you received any other degrees
24	question because you did not receive a degree from	24	after high school?
25	the Chinese school?	25	MR. CHUFF: Objection. Form.
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	Page 62		Page 64
1	HAN CHUNGUANG	1	HAN CHUNGUANG
1 2	HAN CHUNGUANG	1 2	HAN CHUNGUANG
2	MR. CHUFF: Objection.	2	A I went to some institutions or
2	MR. CHUFF: Objection. A I did. I went to the school.	2 3	A I went to some institutions or institution to receive training or trainings.
2 3 4	MR. CHUFF: Objection. A I did. I went to the school. THE INTERPRETER: Interpreter	2 3 4	A I went to some institutions or institution to receive training or trainings. Q In what?
2 3 4 5	MR. CHUFF: Objection. A I did. I went to the school. THE INTERPRETER: Interpreter would like to correct herself.	2 3 4 5	A I went to some institutions or institution to receive training or trainings. Q In what? A I would say I learned it by myself.
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		Page 67		Page 69

1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	gave them to Natasha. I also gave her the CO and	2	A What do you mean by that?
3	stuff so that she could handle stuff for me in	3	
4		4	
	Hong Kong.		Profit's assets were frozen. How did you come to
5	Q When you were serving as a director	5	know that?
6	of Eastern Profit, were there any other directors	6	A Natasha told me.
7	besides yourself?	7	Q So the freezing, excuse me, of the
8	A When I was the director of the	8	assets took place in the two years that Natasha
9	company, no one else was.	9	did services for Eastern Profit?
10	Q When you were director of Eastern	10	A I don't remember. It was a long time
11		11	
	Profit, was it successful?		ago.
12	A Was this successful company? How are	12	Q After the assets of Eastern Profit
13	you going to define whether a company is	13	were frozen, was it able to conduct any business?
14	successful or not? Please teach me.	14	A Natasha could. Just one second.
15	Q Were you pleased with the performance	15	THE INTERPRETER: Can you repeat
16	of Eastern Profit when you were the director of	16	your question? I wanted to have your
17	it?	17	question read back. I want to know
18	• • •	18	
19	MR. CHUFF: Objection.	19	your question.
	Relevance.		(The requested portion of the
20	A It was okay.	20	record was read back by the
21	Q Did Eastern Profit have any debts	21	reporter.)
22	when you were a director?	22	A After the asset was frozen, the
23	MR. CHUFF: Objection. The	23	company didn't do any business.
24	court already ruled on this. There's	24	Q What, as a director of Eastern
25	to be no questioning about the	25	Profit, did you do to challenge the order freezing
20	to be no questioning about the		Front, did you do to challenge the order freezing
	Page 70		Page 72
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1	HAN CHINCHANC	1	HAN CHINCHANC
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2	Profit?	2	company to find out the Chinese government's
3	A That's correct. I was an agent.	3	corruptions. Number 2, to help me unfreeze my
4	Q How long had it been since you were a	4	assets. Number 3 to have my company back to
5	•	5	normal.
6	director of Eastern Profit when the freezing of	6	
7	the assets happened?	7	Q Did anyone replace Natasha after she
	MR. CHUFF: Objection to form.	8	stopped doing work for Eastern Profit?
8	A How long? Again, I don't remember	9	MR. CHUFF: Objection. Asked
9	the specific, but I think about two years.		and answered. Relevance.
10	Q So two years passed after you left	10	A No.
11	being a director of Eastern Profit and when the	11	MS. DONNELLI: We'll make this
12	assets of the company were frozen?	12	the last couple of questions before
13	MR. CHUFF: Objection to form.	13	our break.
14	A Can you repeat your question?	14	Q Prior to the time that Eastern
15	Q How much time passed after you	15	Profit's assets were frozen, did Eastern Profit
16	stopped being a director of Eastern Profit and	16	operate a private equity fund?
17	when the assets were frozen?	17	MR. CHUFF: Objection. This
18	A I don't remember.	18	goes to the independent financial
19	Q Who ordered the freezing of Eastern	19	control and identity of Eastern
20	Profit's assets?	20	Profit, and the court has already
21	MR. PODHASKIE: Objection.	21	ruled this is not a permissible scope
22	Form.	22	of questioning.
23	A I didn't know who ordered it. I	23	MS. DONNELLI: Are you
24	really wanted to know the answer to your question.	24	instructing the witness not to
25	I think it was an order from the communist party	25	answer?
	Turnic it was air order from the communist party		
	Page 74		Page 76
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	in China.	2	MR. CHUFF: Yes.
3	Q You don't know why the assets were	3	Q When you were a director of Eastern
4	frozen or what reason was given?	4	Profit, did it have any clients?
_	MD CHIEF, Objection		
5	MR. CHUFF: Objection.	5	MR. CHUFF: Same objection. It
6	Foundation.	6	MR. CHUFF: Same objection. It goes to independent financial
	_		
6	Foundation.	6	goes to independent financial
6 7	Foundation. A No, I don't.	6 7	goes to independent financial identity, and the court has already
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6 7 8 9	Foundation. A No, I don't. Q You mentioned that transaction was done by Eastern Profit with an investigation company.	6 7 8 9	goes to independent financial identity, and the court has already ruled on this. Q Which family trust did Eastern Profit
6 7 8 9 10	Foundation. A No, I don't. Q You mentioned that transaction was done by Eastern Profit with an investigation	6 7 8 9 10	goes to independent financial identity, and the court has already ruled on this. Q Which family trust did Eastern Profit give the money with which it was making investments?
6 7 8 9 10 11	Foundation. A No, I don't. Q You mentioned that transaction was done by Eastern Profit with an investigation company. Do you remember your testimony? THE INTERPRETER: Can I have the	6 7 8 9 10 11	goes to independent financial identity, and the court has already ruled on this. Q Which family trust did Eastern Profit give the money with which it was making investments? MR. CHUFF: Same objection.
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	my company?	2	ask her for opinion. Just part of a business
3	Q Any kind of compensation.	3	routine.
4	MR. CHUFF: Objection.	4	Q Have you ever been a principal of
5	Misleading.	5	Eastern Profit?
6	A Since I don't feel that this question	6	MR. CHUFF: Objection. Asked
7	has anything to do with this case, this is about	7	and answered.
8	the finance of the company. I'm not going to	8	A When are you talking about?
9	answer it.	9	Q Any time since 2014 to the present.
10	Q Was the reason that you stopped being	10	MR. CHUFF: Same objection.
11	a director of Eastern Profit because you weren't	11	A I am always acting on behalf of
12	being paid for your work?	12	Eastern Profit.
13	MR. CHUFF: Objection. Vague.	13	Q Has he ever held the title principal
14	Confusing and misleading.	14	of Eastern Profit? Have you?
15		15	
16	A Again, this has nothing do with this	16	MR. CHUFF: Same objection.
17	case. I'm not going to answer it.	17	A I don't really understand your
18	Q Did you receive any compensation or	18	question. All I can say to you is that before I
18	payments as an agent of Eastern Profit?	19	transfer it, my company to her, I was the
	A I believe so. I believe when the	20	director. After I transfer my company to her, I
20	company's asset is unfreeze one day, I will	20	was the agent. That is it.
21	receive some compensation, because this is normal	22	Q Do you receive compensation from
22	business model where I believe I will receive some		Golden Spring, New York?
23	compensation one day.	23	A No.
24	Q Before Eastern Profit's assets were	24	Q Have you ever?
25	frozen, did you receive any compensation?	25	A No.
	Page 78		Page 80
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	MR. CHUFF: As an agent or a	2	MS. DONNELLI: We'll take a
3	director?	3	break.
4	Q Either in your capacity as an agent	4	(At this time, a brief recess
5	or a director?	5	was taken.)
6	MR. CHUFF: Objection.	6	(Time noted: 12:54 p.m.)
7	Compound. And to the extent it's	7	(After a luncheon recess was
8	asking for compensation as an owner	8	taken, the following was had:)
9	is misleading.	9	(Time noted: 1:48 p.m.)
10	A When you say about compensation, can	10	
11	you be more specific, because I really don't	11	AFTERNOON SESSION
12	understand the word compensation.	12	CONTINUED EXAMINATION
13	Q It means wages, salary, money for any	13	BY MS. DONNELLI:
14	reason.	14	Q We're here after a break.
15	A When I was a director, when I was a	15	Would you say that
16	boss, of course I received some money. Because I	16	MR. CHUFF: Could I just make
17	was making money or cost, I reaped the benefits.	17	one thing on the record.
18	Q At Eastern Profit is there a	18	So we've been going for two and
19	difference between a principal and a director	19	a half hours now, and virtually none
20	role?	20	of the questioning has been within
21	A Between principal and the director?	21	the scope of what the court ordered
22	Q Yes.	22	Mr. Han to appear for.
23	A Right now Guo Mei is the director of	23	If it continues, we reserve our
24	the company while I am her agent. When I'm	24	rights to seek fees from the court
25	handling her stuff for her out of respect, I will	25	after this deposition.
	<u> </u>		
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Q Would you say, Mr. Han, that you were	2	A I don't think Eastern Profit had ever
3	very careful in your role as a director of Eastern	3	invested in car. But the company owned cars.
4	Profit?	4	Q How many cars did the company own
5	A What do you mean by that?	5	when Mr. Han was a director?
6	Q You wanted everything done right as a	6	
7		7	MR. CHUFF: Objection. This is
8	director of Eastern Profit; correct?	8	all irrelevant.
9	A Yes.	9	A Several.
	Q You wouldn't have signed something		Q Have you ever attended a director's
10	for Eastern Profit unless you were a director of	10	meeting for Eastern Profit?
11	it; right?	11	MR. CHUFF: Objection. This
12	MR. CHUFF: Objection.	12	goes into the financial independence
13	Misleading. Mischaracterizes	13	of Eastern Profit, and the court
14	testimony.	14	already ruled on this. You're not
15	A I don't understand your question.	15	permitted to ask questions about it.
16	What do you mean by that?	16	Q You testified that you put a
17	Q You wouldn't have signed something	17	signature on documents as an agent for Eastern
18	for Eastern Profit unless you were a director of	18	Profit. In connection with that, did you ever
19	Eastern Profit; right?	19	attend any meeting giving you authority to do
20	MR. CHUFF: Same objection.	20	that?
21	A When I was an agent for a company, I	21	A What kind of meeting?
22	had also signed some documents.	22	Q Any kind of meeting in which,
23	Q Is one of Eastern Profit's	23	Mr. Han, you were given authority to make your
24	investments cars?	24	
25		25	signature on behalf of Eastern Profit?
23	MR. CHUFF: Objection. This is	23	MR. CHUFF: Objection. Asked
	Page 82		Page 84
1	LIAN CHUNCHANG	1	LIAN CHUNCHANG
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	beyond the scope of the court order	2	and answered.
3	Mr. Han is here for.	3	A In New York I authorized Yvette to
4	MS. DONNELLI: Are you	4	handle the affairs for me here.
5	instructing the witness not to answer	5	Q What kind of reporting did Yvette do
6	that? It comes directly from	6	to you after you authorized her?
7	Miss Wang's testimony for Eastern	7	A Yvette
8	Profit within the last couple of	8	MR. CHUFF: Objection. Form.
9	weeks.	9	A Not much reporting from her because I
10	MR. CHUFF: It's beyond the	10	trust her very much in the same position against
11	scope of what the court ordered for	11	communist party in China.
12	Mr. Han.	12	I have full confidence in her to
13	MS. DONNELLI: So are you	13	handle the affair for me. There's not much
14		14	
15	instructing the witness not to	15	reporting required from her. Of course
	answer?	16	occasionally we talked a little bit about it.
			Q Did you authorize Yvette to handle
16	MR. CHUFF: You can ask your		Half coal coal coal coal coal
17	question.	17	all the affairs of eastern profit or just the one
17 18	question. MS. DONNELLI: Okay. Can you	17 18	involving the investigative project?
17 18 19	question. MS. DONNELLI: Okay. Can you read it back? Thank you.	17 18 19	involving the investigative project? A Everything.
17 18	question. MS. DONNELLI: Okay. Can you read it back? Thank you. (The requested portion of the	17 18	involving the investigative project? A Everything. Q For the everything, did you ever
17 18 19	question. MS. DONNELLI: Okay. Can you read it back? Thank you.	17 18 19	involving the investigative project? A Everything.
17 18 19 20	question. MS. DONNELLI: Okay. Can you read it back? Thank you. (The requested portion of the record was read back by the	17 18 19 20	involving the investigative project? A Everything. Q For the everything, did you ever
17 18 19 20 21	question. MS. DONNELLI: Okay. Can you read it back? Thank you. (The requested portion of the record was read back by the reporter.)	17 18 19 20 21	involving the investigative project? A Everything. Q For the everything, did you ever authorize Yvette to approve an invoice for Eastern Profit?
17 18 19 20 21 22	question. MS. DONNELLI: Okay. Can you read it back? Thank you. (The requested portion of the record was read back by the reporter.) A What cars?	17 18 19 20 21 22	involving the investigative project? A Everything. Q For the everything, did you ever authorize Yvette to approve an invoice for Eastern Profit? MR. CHUFF: Objection. Assuming
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17 18 19 20 21 22 23 24	question. MS. DONNELLI: Okay. Can you read it back? Thank you. (The requested portion of the record was read back by the reporter.) A What cars?	17 18 19 20 21 22 23 24	involving the investigative project? A Everything. Q For the everything, did you ever authorize Yvette to approve an invoice for Eastern Profit? MR. CHUFF: Objection. Assuming facts.
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	authorization to Yvette, I'm actually talking	2	Q Was that because the assets of
3	about everything related to the hired	3	Eastern Profit were frozen?
4	investigation company.	4	A Yes.
5	Q I thought your testimony was that you	5	Q What volume of assets of Eastern
6	authorized a Yvette to handle all of the affairs	6	Profit were frozen?
7	of Eastern Profit?	7	MR. CHUFF: Objection. Vague as
8		8	to what volume means.
9	A No. Thing related to this matter.	9	
10	Q What do you mean by "this matter"?	10	A Are you asking me to give you a number or what?
11	A To hire this investigation company	11	
12	and also to handle everything related to the hired	12	Q More of a category. Was it all of
	investigation company.	13	Eastern Profit's assets that were frozen, a
13	Q Was there anything else that you		portion of them, something less than all?
14	authorized Yvette to handle for Eastern Profit?	14	A My company account or accounts was
15	A Only for this investigation and	15	all were freezed.
16	everything related to it.	16	THE INTERPRETER: Again in
17	Q Did you get permission from Guo Mei	17	Chinese there's no singular or
18	to authorize Yvette?	18	plural.
19	MR. CHUFF: Objection. Asked	19	Q In total or just in part?
20	and answered.	20	A All.
21	A I did not have to have permission for	21	Q You testified that the reason that
22	Guo Mei. However, I did report it to her. I did	22	Eastern Profit got involved with the investigative
23	speak to her about it.	23	company was to unfreeze Eastern Profit's assets.
24	Q Were you the person who chose Yvette	24	Do you remember that testimony?
25	for her role versus someone else?	25	MR. PODHASKIE: Objection.
			•
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1	LIANI CHI INICHANIC	1	LIANI CHI INICHANIC
	HAN CHUNGUANG	2	HAN CHUNGUANG
2	A Yes.		Mischaracterizes the testimony.
3	Q In connection with Yvette's work, did	3	A Yes, I did.
4	she have control over Eastern Profit's bank	4	Q Was that project successful to
5	accounts?	5	unfreeze Eastern Profit's assets?
6	MR. CHUFF: Objection. It's	6	A Up to now, no. It's not successful.
7	beyond the scope of what the court	7	Q Eastern Profit's assets remain frozen
8	allowed Mr. Han to testify about.	8	today; is that true?
9	A I don't want to answer this question.	9	A Yes.
10	Q Are you instructing the witness not	10	Q Do you know how long that the
11	to answer the question? It relates specifically	11	investigative company was allowed to do its work?
12	to the work that Yvette did in relation to Eastern	12	A When Yvette talked to me at the time,
13	Profit and the investigative project?	13	she said it would only take several months and we
14	MR. CHUFF: Can you explain that	14	will see the result of it.
15	to me? I don't see how it does.	15	Q When Eastern Profit didn't see the
16	MS. DONNELLI: In connection	16	result of it, did it hire any other company to do
17	with that work I've asked did Yvette	17	the investigation?
18	have control over Eastern Profit's	18	MR. CHUFF: Objection. Are you
19	bank accounts in connection with that	19	asking of the same targets, that's
20	work.	20	strategic vision?
21	MR. CHUFF: You didn't use that	21	MS. DONNELLI: Counsel, please
22	last phrase.	22	don't testify for the witness. You
23	Q In relation to the investigative	23	made an objection to form. Let us go
24	project.	24	on.
25	A She couldn't.	25	MR. CHUFF: I'm just trying to
	,, one couldn't		Shorri Im jast dying to
]	Page 87		Page 89

1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	help you.	2	to enter into an arrangement with the
3	MS. DONNELLI: I don't think	3	investigative company?
4	you're trying to help.	4	MR. PODHASKIE: Objection.
5	MR. CHUFF: I am because the	5	Beyond the scope of the court's
6	court said you're allowed to ask	6	order.
7	•	7	
8	about the subjects that were part of	8	A No. I give the full authorization to
9	the Strategic Vision contract and not	9	Yvette. It was not necessary to require a
	other subjects.		resolution.
10	So if you want to ask about	10	Okay. Let me tell you why I give
11	those subjects, it's permissible.	11	Yvette full authorization over this matter. The
12	Otherwise it's not.	12	reason was that Miss Guo was against communist
13	Q Regarding any of the work that	13	party in China. I followed Mr. Guo's example. I
14	Eastern Profit hired the investigative company to	14	was also strongly against the communist party in
15	do, once that unfreezing of assets didn't happen,	15	China wands that was why the Chinese government
16	did Eastern Profit hire any other company for the	16	freeze my asset.
17	purpose of unfreezing the assets through	17	And when Yvette told me about this
18	investigative work?	18	wonderful company that would be able to expose the
19	A This has nothing to do as it is.	19	Chinese government's corruption and it will give
20	Q Please answer the question.	20	me an opportunity to get my asset back. She also
21	A I don't want to answer.	21	assured me that in U.S., this could be done
22	MR. CHUFF: You can answer, if	22	legally, and I thought that this was wonderful
23	you know.	23	idea. I get gave her my full authorization to
24	A Are you asking if Eastern Profit	24	handle this matters.
25	hires another investigative company to do the same	25	Like Miss Guo, we were all against
	Times another investigative company to do the Same		Line 11133 Guo, we were all against
	Page 90		Page 92
1	HANI CHUNICHANIC	1	HAN CHUNCHANC
1	HAN CHUNGUANG	2	HAN CHUNGUANG
2	job.	3	the communist parties in China. I gave her my
3	Q Yes. After the first investigative		full authorization to take charge of this matter.
4	company was no longer doing the project.	4	Q What is located at the Tai Yau
5	A I'm not sure.	5	building located at 181 Johnston Road, Wanchai,
6	Q Your testimony is that you're not	6	W-A-N-C-H-A-I, Hong Kong, if you know?
7	aware of any other company that came in after to	7	MR. CHUFF: Objection. Beyond
8	do the same work; true?	8	the scope of the court's order.
9	A Yes.	9	A This has nothing to do with this
10	Q When Eastern Profit was entering into	10	case. I am not at liberty to answer this
11	the project with the investigation company, did	11	question.
12	Eastern Profit pass a resolution to allow that	12	Q How do you know that the Chinese
13	transaction?	13	communist party was involved in the freezing of
14	A I authorized Yvette to take care of	14	Eastern Profit's assets?
15	this business, and Yvette had my full	15	A Can you repeat your question?
16	authorization to take care of things like this.	16	(Interpreter complying)
17	Q Was a resolution signed by you	17	A Mr. Guo was in stanch option to
18	allowing Yvette to do this?	18	Chinese communist party. I followed his example,
19		19	
20		20	and as a result of my position, my family was
21	mean by resolution.		persecuted by the Chinese communist party, and
	Q Do you know what the term resolution	21	then my accounts in Hong Kong were freezed, and my
22	means in the context of a private company?	22	workers were taken away by the police.
23	A Yes, I do.	23	Who else did they have such kind
24	Q Did Eastern Profit's company bylaws	24	of power to take away my people without leaving a
25	require a resolution before Yvette was permitted	25	trace. It was only the communist party in China.
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	i age 71	1	i age 73

1	LIANI CHI INCLIANIC	1	HANI CHIINCHANC
2	HAN CHUNGUANG	2	HAN CHUNGUANG
	Q You say that your workers were taken		testimony.
3	away. Did they work for Eastern Profit?	3	MR. CHUFF: This court has
4	MR. PODHASKIE: Objection.	4	already ruled that you can't ask
5	Beyond the scope.	5	those questions. Is not tied to any
6	A Natasha. Natasha was taken away.	6	claim or defense in this action.
7	Q Is Natasha the workers, plural, that	7	MS. DONNELLI: See the problem
8	you just described?	8	is that the time the court entered
9	THE INTERPRETER: The	9	that order, the representation had
10	interpreter note the plurals should	10	been made by your side of things that
11	be the mistake of interpreter,	11	Mr. Han didn't have knowledge. There
12	because interpreter would not know	12	was no reason to have him as a
13	how many workers because Chinese	13	witness. He didn't have anything to
14	doesn't have singular or plural.	14	say.
15	A Yes, Natasha. I was talking about	15	We now know based on Miss Wang's
16	Natasha, my agent back then.	16	testimony a couple of weeks ago that
17	Q Did the interpreter use the name	17	Mr. Han does have information and he,
18	Q-U-G-A-I-O G-U-O-J-I-A-O in relation to that	18	in fact, has been describing that
19	last answer?	19	·
20		20	information today.
21	A Interpreter only repeated what the	21	MR. CHUFF: Why the assets got
22	witness said. Now unfortunately interpreter has	22	seized has nothing to with the
23	no memory of what my reputation is.		contract and whether the contract was
	Q Mr. Han, what did you do to qualify	23	performed, or whether someone lied
24	as a dissident in the eyes of the Chinese	24	about whether Guo was a dissident.
25	communist party?	25	It's irrelevant and it's beyond
	D 04		D 06
	Page 94		Page 96
1	HANI CHLINICHANIC	1	HAN CHINCHANC
1 2	HAN CHUNGUANG	1 2	HAN CHUNGUANG
2	MR. CHUFF: Objection. It's way	2	the scope of what the court allowed
2 3	MR. CHUFF: Objection. It's way beyond the scope and the Court has	2 3	the scope of what the court allowed this witness to testify to.
2 3 4	MR. CHUFF: Objection. It's way beyond the scope and the Court has already said you can't ask about	2 3 4	the scope of what the court allowed this witness to testify to. MS. DONNELLI: This witness has
2 3 4 5	MR. CHUFF: Objection. It's way beyond the scope and the Court has already said you can't ask about personal history for coming to the	2 3 4 5	the scope of what the court allowed this witness to testify to. MS. DONNELLI: This witness has testified that the actions by the
2 3 4 5 6	MR. CHUFF: Objection. It's way beyond the scope and the Court has already said you can't ask about personal history for coming to the United States.	2 3 4 5 6	the scope of what the court allowed this witness to testify to. MS. DONNELLI: This witness has testified that the actions by the Chinese communist party directly led
2 3 4 5 6 7	MR. CHUFF: Objection. It's way beyond the scope and the Court has already said you can't ask about personal history for coming to the United States. MS. DONNELLI: Right. I'm	2 3 4 5 6 7	the scope of what the court allowed this witness to testify to. MS. DONNELLI: This witness has testified that the actions by the Chinese communist party directly led to Eastern Profit getting involved in
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1	HAN CHUNGUANG	1 HAN CHUNGUANG
2		TIAN CHOIGGANG
3	MR. CHUFF: What element of what	A I don't know the specific, but I
	defense or claim does this relate to.	neard about this person before.
4	MS. DONNELLI: There are fraud	4 Q From.
5	claims.	5 MR. CHUFF: Note my objection.
6	MR. CHUFF: I know that's what	6 Asked and answered.
7	you guys keep saying. But explain it	7 A For Mr. Guo. Mr. Guo mentioned him
8	to me because I don't understand it,	8 before.
9	and the court hasn't understood it.	⁹ Q In relation to Mr. Guo wanting to
10	THE INTERPRETER: It's getting	find out information about this person.
11	real long.	11 A No. I didn't know why Mr. Guo
12	MS. DONNELLI: I'm sorry. I've	mentioned about this person.
13	gotten a little lost.	Q This name, are you familiar with Sun,
14		Q This name, are you familiar with Sun,
15	You made an objection. I	5 5 14, the mot name of the last name, and then
	responded. Are you instructing the	the mot name is Eijan, E 1 5 6 14.
16	witness not to answer?	A Again, I heard those people before.
17	MR. CHUFF: Can you just repeat	Q From Mr. Guo?
18	the question for me one more time?	¹⁸ A Yes.
19	(The requested portion of the	Q Did you understand that that
20	record was read back by the	individual was one of the subjects that the
21	reporter.)	investigative company was going to research?
22	MR. CHUFF: The answer to	A Again, I don't know any specifics
23	counsel's question is yes.	about the project.
24	MS. DONNELLI: So the witness is	Q When you authorized Yvette to get
25	being instructed not to answer that	25 involved with the investigation project, did you
	being instructed flot to dribwer triat	involved that the investigation projectly that you
	Page 98	Page 100
1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	question?	give Yvette any names or subjects that should be
3	MR. CHUFF: Because it's beyond	³ researched?
4	the scope of what the court allowed	4 A No.
5	him to testify to.	5 Q Why did you resign from being a
6	Q Are you familiar with the name Meng	6 director of Eastern Profit?
7	Jianzhu. Last name is M-E-N-G. First name is	7 MR. CHUFF: Objection. Assumes
8	J-I-A-N-Z-H-U.	8 facts. Mischaracterizes the
9	A I have heard this person before.	9 testimony.
10	Q Who do you know the person to be?	10 A Does this question have anything to
11	A When I was with Mr. Guo and we were	do with this case? If not, I'm not going to
12	against Chinese communist party, I heard about	answer the question.
13		13 Q Yes, it does.
1 - 5		-~ U 125, IL UU25.
1 /	this person. I think this person was a Chinese	
14	official.	14 A I remained an agent for the company
15	official. Q Was this person one of the subjects	A I remained an agent for the company even after I had transferred the company to Guo
15 16	official. Q Was this person one of the subjects that Eastern Profit asked the investigative	A I remained an agent for the company even after I had transferred the company to Guo Mei.
15 16 17	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research?	14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it
15 16 17 18	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection.	14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it 18 not, also a resignation by you as director of
15 16 17 18 19	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection. Foundation.	14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it 18 not, also a resignation by you as director of 19 Eastern Profit?
15 16 17 18 19 20	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection.	14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it 18 not, also a resignation by you as director of
15 16 17 18 19	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection. Foundation.	14 A I remained an agent for the company 15 even after I had transferred the company to Guo 16 Mei. 17 Q It was more than a transfer, was it 18 not, also a resignation by you as director of 19 Eastern Profit?
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15 16 17 18 19 20 21	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection. Foundation. A As far as the specifics, we related	A I remained an agent for the company even after I had transferred the company to Guo Mei. Q It was more than a transfer, was it not, also a resignation by you as director of Eastern Profit? A Yes. But I transferred the company to Guo Mei. However, she still authorized me to handle the affairs for the company.
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15 16 17 18 19 20 21 22 23	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection. Foundation. A As far as the specifics, we related it to the investigation project. I don't have a clear idea. I authorized Yvette to take charge of it. Q So you don't know the answer to that	A I remained an agent for the company even after I had transferred the company to Guo Mei. Q It was more than a transfer, was it not, also a resignation by you as director of Eastern Profit? A Yes. But I transferred the company to Guo Mei. However, she still authorized me to handle the affairs for the company. Q Did you resign from Eastern Profit as a director?
15 16 17 18 19 20 21 22 23 24	official. Q Was this person one of the subjects that Eastern Profit asked the investigative company to research? MR. CHUFF: Objection. Foundation. A As far as the specifics, we related it to the investigation project. I don't have a clear idea. I authorized Yvette to take charge of it.	A I remained an agent for the company even after I had transferred the company to Guo Mei. Q It was more than a transfer, was it not, also a resignation by you as director of Eastern Profit? A Yes. But I transferred the company to Guo Mei. However, she still authorized me to handle the affairs for the company. Q Did you resign from Eastern Profit as a director?
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		_	
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Q When did you resign as a director?	2	her. All this was not contradictory to each
3	A On June 27, 2017 the company was	3	other.
4	transferred to Guo Mei, and Guo Mei asked me to	4	Q What do you mean by contradictory to
5	continue to handle the company's affairs as an	5	each other?
6	agent for her.	6	MR. CHUFF: Objection.
7		7	
8	MS. DONNELLI: Can you read the	8	A She asked me to be her agent, to take
9	question, because the witness did not	9	care of the affairs for her, and we were good
	accept it.		friends. And I say okay. Fine. I will do so.
10	(The requested portion of the	10	I became an agent of the company.
11	record was read back by the	11	That was it.
12	reporter.)	12	Q So Guo Mei asked you to resign from
13	A June 27, 2017.	13	your directorship of Eastern Profit?
14	Q Why did you resign as a director of	14	MR. CHUFF: Objection. Assumes
15	Eastern Profit?	15	facts. Mischaracterizes testimony.
16	A This was one of my business'	16	A No.
17	strategies which has nothing to do with this case.	17	Q How did you come to know that Guo Mei
18	I'm not going to answer it.	18	had a plan that required you to resign as director
19	MS. DONNELLI: We'll need to ask	19	from Eastern Profit?
20	the witness to answer the question.	20	MR. CHUFF: Objection. Assumes
21	MR. CHUFF: Objection.	21	facts. Mischaracterizes the
22	Argumentative. Asked and answered.	22	testimony. Beyond the scope of what
23	A I don't want to answer this question,	23	the court ordered him to testify to.
24	and I insist that I not answer this question.	24	A She told me she wanted to purchase my
25	Q Do you have the answer to the	25	company to get into movie business. Then it's
	Q Do you have the answer to the	23	company to get into movie business. Therries
	Page 102		Page 104
1	LIANI CHI INCHANC	1	HAN CHUNCHANC
	HAN CHUNGUANG		HAN CHUNGUANG
2	question in your mind?	2 3	long. Then she asked me to stay on to help her
3	A What answer?	4	out as an agent.
4	Q If the answer to the question is you		Q Wasn't it Mr. Guo's wish for his
5	don't know why you resigned from the company,	5	daughter to purchase Eastern Profit from you?
6	that's one thing. But if the witness has the	6	MR. CHUFF: Objection. Beyond
7	answer in his mind, he needs to give it in	7	the scope.
8	response to the question.	8	A I don't know.
9	MR. CHUFF: Objection. I	9	Q Did you resign from Eastern Profit
10	disagree. It's clearly beyond the	10	because you needed someone to buy the stock from
11	scope of what the court ordered.	11	you, you were short on money?
12	A I am not going to answer this	12	MR. CHUFF: Objection. This is
13	question.	13	way beyond the scope that the court
14	Q Explain why you resigned as director	14	allowed this witness to appear, and
15	of Eastern Profit that remained as you are	15	the topic then, the court allowed
16	testifying in a role allowing you to be involved	16	them to testify to.
17	with Eastern Profit?	17	MS. DONNELLI: I'm about to hand
18	MR. CHUFF: Objection. Asked	18	the witness a document that was
19	and answered.	19	produced by Eastern Profit. I think
20	A This was a business strategy of mine.	20	it is relevant. Why else would it
21	And when I transferred the company to Guo Mei, Guo	21	have been produced?
22	Mei had some intention to how to use this company.	22	MR. CHUFF: Whether he needs the
23		23	money is in a document? I doubt it.
24	She had her idea what she was going	24	MS. DONNELLI: We're marking
25	to do about it. And then she asked me to be an	25	this as Exhibit 30.
۷.	agent for this company to handle the affairs for		uiis as exhibit su.
	Page 103		Page 105

1	LIAN CHUNCHANG	1	LIANI CHUNCHANG
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	(Defendant's Exhibit 30, Notice	2	take a break?
3	of Change of Company Secretary and	3	MR. CHUFF: If it's okay with
4	Director (Appointment/Cessation)	4	you, yes.
5	Bates stamped EASTERN-000400 to 402	5	MS. DONNELLI: Let's take a
6	marked for Identification as of this	6	break at the witness' request for,
7	date.)	7	say, 10 minutes.
8	MS. DONNELLI: This is the first	8	(At this time, a brief recess
9	exhibit we've used.	9	was taken.)
10	Q Mr. Han, if you turn to the third	10	CONTINUED EXAMINATION
11	page of the document. At the bottom of the	11	BY MS. DONNELLI:
12	document do you see your name typewritten?	12	Q We're back on the record.
13	A Yes.	13	MR. CHUFF: We've gone another
14	Q Is that the handwritten form of your	14	hour and still haven't hit the topics
15	name above it?	15	that the court Mr. Han to testify to.
16	A Yes.	16	We're reserving the right to seek
17	Q Did you place your name on this	17	fees for this waste of time.
18	document?	18	Q I'm going to hand you, Mr. Han, a
19	A Yes.	19	piece of paper. I have written three lines, and
20		20	
	Q Did you place your name on this	21	I've asked for you to write your name, hand write
21	document on June 27, 2017?	22	your name on those three lines.
22	A Yes.		I'm going to hand you a document that
23	Q The second page of the document, on	23	we're going to mark. By the way, that is
24	the box that is numbered 17, the second 17 at the	24	Exhibit 31, this piece of paper. The three places
25	bottom	25	that the witness has written his name is 31.
	D 106		D 100
	Page 106		Page 108
1			
		1 1	HANI CHINICHANIC
	HAN CHUNGUANG	1	HAN CHUNGUANG
2	A Yes.	2	(Defendant's Exhibit 31, a
2 3	A Yes. Q who has signed there?	2 3	(Defendant's Exhibit 31, a piece of yellow paper containing the
2 3 4	A Yes. Q who has signed there? MR. CHUFF: Objection.	2 3 4	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times
2 3 4 5	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation.	2 3 4 5	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this
2 3 4 5 6	 A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. 	2 3 4 5 6	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.)
2 3 4 5 6 7	 A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this 	2 3 4 5 6 7	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going
2 3 4 5 6 7 8	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this Exhibit 30?	2 3 4 5 6 7 8	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter?
2 3 4 5 6 7 8 9	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this Exhibit 30? MR. CHUFF: Objection. This is	2 3 4 5 6 7 8	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter? MS. DONNELLI: Yes. The
2 3 4 5 6 7 8 9	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this Exhibit 30?	2 3 4 5 6 7 8 9	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter?
2 3 4 5 6 7 8 9	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this Exhibit 30? MR. CHUFF: Objection. This is	2 3 4 5 6 7 8	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter? MS. DONNELLI: Yes. The
2 3 4 5 6 7 8 9 10 11	A Yes. Q who has signed there?	2 3 4 5 6 7 8 9 10 11	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter? MS. DONNELLI: Yes. The reporter is going to keep the
2 3 4 5 6 7 8 9 10	A Yes. Q who has signed there?	2 3 4 5 6 7 8 9 10 11	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter? MS. DONNELLI: Yes. The reporter is going to keep the exhibits.
2 3 4 5 6 7 8 9 10 11	A Yes. Q who has signed there? MR. CHUFF: Objection. Foundation. A Guo Mei's signature. Q Did Guo Mei ask you to sign this Exhibit 30? MR. CHUFF: Objection. This is treading into what the court has said counsel may not ask about which is the sale of Eastern Profit from Mr. Han to Guo Mei. It's docket	2 3 4 5 6 7 8 9 10 11	(Defendant's Exhibit 31, a piece of yellow paper containing the witness' name handwritten three times marked for Identification as of this date.) MR. CHUFF: Will that be going to the reporter? MS. DONNELLI: Yes. The reporter is going to keep the exhibits. We're going to mark as
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1 HAN CHUNGUANG	1 HAN CHUNGUANG
2 Q All right. The second page, is that	2 MR. PODHASKIE: Objection.
your handwritten name above the words Chunguang	3 Asked and answered.
4 Han?	4 THE INTERPRETER: Interpreter
5 A Yes.	5 needs the witness to repeat one
6 Q Did you place your handwritten	6 portion of answer.
7 signature there?	7 (Witness complying)
8 A Yes.	8 A Guo Mei gave me authorization to
9 Q Was this on behalf of Eastern Profit?	g agent, and then I gave the authorization to Yvette
10 A Yes.	to handle the matters.
A Tes.	to hardie the matters.
11 Q What was the purpose of this 12 document?	Q Was I vette an agent also.
document.	70 Test Fitter 1 gave her the
A This was a rower of Accorney that I	dationzation, she harrance the matters, an the
gave rvette the authority to harrie the	matters on my bendin
investigation company's matter.	Q Were the dutionizations done at the
Q When did you sign this?	same time?
17 A Last year, 2018.	MR. CHUFF: Objection. Asked
Q Who asked you to sign this on behalf	and answered.
19 of Eastern Profit?	A After June 27, 2017 when I
A I don't understand your question.	transferred my company to Guo Mei, Guo Mei
21 (The requested portion of the	authorized me to be her agent. And then not long
record was read back by the	after that, I authorized Yvette to handle the
reporter.)	matter for me.
MR. CHUFF: Objection. Assumes	Q Was the authorization from Guo Mei to
²⁵ facts.	you put in writing?
D 110	D 112
Page 110	Page 112
1 HAN CHUNGUANG	1 HAN CHUNGUANG
2 A Yvette told me at the time we were	² MR. CHUFF: Objection. Asked
3 lied to, we were deceased, and we might have to	and answered.
file a lawsuit against the other parties.	4 A No. Orally only.
5 One day last year Yvette called me	5 Q Was your authorization to Yvette put
6 saying that she had this document for me to sign	6 in writing?
saying that the had this accument for the to sign	in Whang.
to dutilonze her to handle all these matters. I	A TICIC.
Sala stay: Fina crieft I Welle to Treate 5, 765,	Q THI SOLLY. 163 EXHIBIT 32:
reces of the to sight this document.	A Tesi
Q Where was rvette's office located.	Q At the time that you signed
11 MR. CHUFF: Objection. Asked	Exhibit 52, you were no longer a undecer of
and unswered.	Editionity correct.
A 800 Fifth Avenue.	The Chorr. Objection. Asked
Q So you did not prepare this document	und difforered.
15 yourself?	15 A That's correct.
16 A No, I did not.	Q As a director of Eastern Profit, you
Q Why did Guo Mei not sign this	never allowed it to enter into a transaction
18 document?	without signing a contract; correct?
A Because Guo Mei gave me the	A I don't understand your question.
authorization to handle the matters, and I gave	Q When you were a director of Eastern
the authorization to Yvette to handle the matters.	Profit, did it enter into any transaction without
And Yvette would report to me.	signing a written document?
Q So we have two authorizations, one	MR. CHUFF: Objection. Form.
from Guo Mei to you and one from you to Yvette;	A I don't understand your question.
²⁵ correct?	What do you mean by transaction without contract.
n 111	D 112
Page 111	Page 113

1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	Q Mr. Han, you wouldn't enter into a	2 Misleading. Attempting to confuse
3	transaction for Eastern Profit without a contract;	the witness.
4	true?	4 A No. I signed the document because I
5		71 Hor I signed the document because I
6	A In general, yes.	was an agent for Eastern Forth
7	Q So why didn't you require Guo Mei to	Q Explain to the villy due i lei took your
	put her authorization to you in writing?	Tole us director of Edstern Fronti. Willy did she
8	MR. CHUFF: Objection.	8 not coordinate directly with Yvette and leave you
9	Misleading. Irrelevant.	9 out of this document 32?
10	A No. It was not necessary. I had	10 A I don't know why she didn't do that.
11	known her for a long time. I built enough trust	11 However, I was an agent of the company. And over
12	to trust in her over this.	this matter, Yvette and I initiated the project.
13	Q When Yvette asked you to sign	When the project became problematic,
14	Exhibit 32, did you say: Wait a second. I can't	of course I will continue to finish it off as an
15	sign this. I'm no longer a director of Eastern	agent of the company.
16	Profit?	16 Q What is the difference, Mr. Han,
17	MR. CHUFF: Objection.	between an agent and a director of Eastern Profit?
18	Misleading. He's already testified a	18 MR. CHUFF: Objection. Calls
19	number of times that he's an agent.	for a legal conclusion.
20	MS. DONNELLI: Please stop	A The director is Guo Mei, and Guo Mei
21	testifying for the witness.	tells me it's her agent. I can handle matters for
22	MR. CHUFF: Stop trying to	her on her behalf.
23	confuse the witness.	23 Q But you weren't handling matters for
24	MS. DONNELLI: Please stop	her, you were delegating to Yvette; isn't that
25	testifying for the witness.	25 true?
	testifying for the withess.	23 true?
	Page 114	Page 116
	<u> </u>	
1	HAN CHUNGUANG	¹ HAN CHUNGUANG
1 2	HAN CHUNGUANG MR. CHUFF: He testified five	1 HAN CHUNGUANG 2 MR. CHUFF: Objection.
		11/11/ 6/10/100/11/0
2	MR. CHUFF: He testified five	2 MR. CHUFF: Objection.
2 3	MR. CHUFF: He testified five times now that he's an agent. MS. DONNELLI: You're	2 MR. CHUFF: Objection. 3 Mischaracterizes the testimony. 4 Argumentative.
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		1	
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Q The help that you asked her for was	2	that your signature?
3	Exhibit 32; correct?	3	MR. CHUFF: Objection. I would
4	A Yes. And it started from the moment	4	ask the translator to read the title
5	she mentioned that she had found this	5	of the document to the witness.
6		6	
7	investigation company. I authorized her to deal	7	MS. DONNELLI: I would ask the
	with the investigation company and all other		witness if this is the handwritten
8	related issues.	8	form of his signature on the last
9	(Defendant's Exhibit 33, a	9	page of Exhibit 34.
10	document titled Substitution of	10	MR. CHUFF: You're not providing
11	Counsel consisting of two pages	11	translated copies of the document. I
12	marked for Identification as of this	12	would ask the translator to read the
13	date.)	13	title.
14	Q I'm going to hand you what we marked	14	MS. DONNELLI: I'm instructing
15	as Exhibit 33. Is that your handwriting signature	15	you not to. The witness can be asked
16	above the typewritten words of your name?	16	questions after I'm done.
17	A Can you tell me what this is?	17	At least for my question,
18	Q Answer the question first, and then	18	Exhibit 34, is that the handwritten
19	•	19	form of the witness' signature on the
20	I'm happy to. A Before you tell me what this document	20	last page?
21		21	MS. DONNELLI: Miss translator,
22	is, I cannot tell whether this is my signature.	22	please just listen to my instruction
	Q Are you, Mr. Han, saying you cannot	23	· · · · · · · · · · · · · · · · · · ·
23	recognize your signature, whether it appears on	24	as the attorney taking the
24	this document?	25	deposition.
25	MR. CHUFF: Objection.	23	MR. CHUFF: You have to
	Page 118		Page 120
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	Argumentative. This was an English	2	translate the objection too. That's
3	speaking witness. They would be able	3	ridiculous.
4	to read the document. You should	4	THE INTERPRETER: The
5	tell them what they're looking at.	5	interpreter has translated the
6	MS. DONNELLI: He can answer the	6	question three times per instruction
7	question.	7	of the questioning witness.
8	A It doesn't look like my signature.	8	MS. DONNELLI: Can you read the
9	MR. CHUFF: Are you going to	9	most recent question that I've asked?
10	tell him what you were looking at?	10	THE INTERPRETER: The signature?
11	You said you would after he answered	11	MS. DONNELLI: We'll start it
12		12	
13	the question.	13	like this.
14	MS. DONNELLI: We're moving on.	14	Q The last page of Exhibit 34, is that
	MR. CHUFF: Okay.		the handwritten form of your name?
15	MS. DONNELLI: We're going to	15	MR. CHUFF: I instruct the
16	look at what we have marked as	16	witness to ask what document it is
17	Exhibit 34.	17	that he's looking at.
18	(Defendant's Exhibit 34, a	18	MS. DONNELLI: You can instruct
19	document titled Research Agreement	19	the witness, which is improper. The
20	dated December 29, 2017 Bates stamped	20	witness can answer the question, and
21	EASTERN-000005 to 000009 marked for	21	you can ask your witness questions
22	Identification as of this date.)	22	after I'm done.
23	Q I would ask for you to turn to the	23	MR. CHUFF: You are being
24	last page of this document.	24	completely unfair to the witness. He
25	On the bottom right-hand side, is	25	cannot read what document.
	Page 119		Page 121

1	HAN CHUNCHANC	1	HAN CHUNGUANG
2	HAN CHUNGUANG	2	document?
3	MS. DONNELLI: How do you know	3	
	what he can and can't do? That in	4	MR. CHUFF: Objection.
4	itself is an interesting question.		Mischaracterizes the testimony.
5	But the one that matters for now is	5	A Since you show me an English
6	the last one I asked.	6	document, which I cannot read, and then you ask me
7	Can you repeat that to the	7	whether my signature is on it, I think it is
8	witness?	8	normal in nature for me to ask what this document
9	THE INTERPRETER: (Complying)	9	is before I answer your question. I have right to
10	MR. CHUFF: I instruct the	10	know what this document, English document, is.
11	witness not to answer it until	11	Q Is today the first day you've seen
12	counsel tells him what he's looking	12	Exhibit 34?
13	at.	13	A Yes.
14	MS. DONNELLI: The witness is	14	MS. DONNELLI: We may come back
15	going to heed your instruction?	15	to Exhibit 34 in a moment. For now I
16	A Yes, I will listen to my attorney.	16	will mark Exhibit 35.
17	MS. DONNELLI: So that we have a	17	(Defendant's Exhibit 35, a
18	clear record, the witness on	18	document titled Loan Agreement Bates
19	instruction of his counsel is	19	
20		20	stamped EASTERN-000278 to 280 marked
21	refusing to answer the question	21	for Identification as of this date.)
22	whether his signature appears in		Q If we turn to the last page of
	handwritten form on the last page of	22	Exhibit 35.
23	Exhibit 34.	23	A Yes. I'm looking at it.
24	MR. CHUFF: Because defendant's	24	Q Thank you. Do you see two
25	counsel refuses to identify the	25	handwritten signatures on the last page of
	D 122		D 124
	Page 122	-	Page 124
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	document for a non English-speaking	2	Exhibit 35?
3	document for a non English-speaking	_	EXHIBIT 33:
	witness	3	A Voc
	witness.	3	A Yes.
4	Q I'm going to hand you Exhibit 31,	4	Q Is one of them the handwritten form
4 5	Q I'm going to hand you Exhibit 31, Mr. Han. Do you need me to tell you what that	4 5	Q Is one of them the handwritten form of your name?
4 5 6	Q I'm going to hand you Exhibit 31, Mr. Han. Do you need me to tell you what that document is before you can recognize whether it's	4 5 6	Q Is one of them the handwritten form of your name? MR. CHUFF: Same objection.
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4 5 6 7 8 9 10	Q I'm going to hand you Exhibit 31, Mr. Han. Do you need me to tell you what that document is before you can recognize whether it's the handwritten form of your signature? A Can you ask the interpreter to tell me what this document is. Q Can you answer the question about Exhibit 31, please?	4 5 6 7 8 9 10	Q Is one of them the handwritten form of your name? MR. CHUFF: Same objection. A The one above is. Q Is that signature to the right of the typewritten form of your name? A Yes. Q Did you place your signature on this
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4 5 6 7 8 9 10	Q I'm going to hand you Exhibit 31, Mr. Han. Do you need me to tell you what that document is before you can recognize whether it's the handwritten form of your signature? A Can you ask the interpreter to tell me what this document is. Q Can you answer the question about Exhibit 31, please? A Yes. So what is your question related to this document?	4 5 6 7 8 9 10 11 12 13	Q Is one of them the handwritten form of your name? MR. CHUFF: Same objection. A The one above is. Q Is that signature to the right of the typewritten form of your name? A Yes. Q Did you place your signature on this
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2	the loan agreement between William and I.	2	A In business meetings in Hong Kong I
3	Q Did Mr. Han, you place your signature	3	met William, as a result of which we became good
4	and handwriting on page 3 of this Exhibit 35.	4	friends.
5	A Yes.	5	Q Was the meeting in Hong Kong about
6		6	Eastern Profit business?
7	Q When did you do that?	7	
8	A In 2018. No. I think at end of	8	A No.
	2017.	9	Q Who does Mr. G work for?
9	Q Which is your answer?		MR. CHUFF: Objection. The
10	MR. CHUFF: Objection.	10	court already ruled that you cannot
11	A What?	11	ask about ACA's financial
12	Q Which is your answer?	12	information.
13	MR. PODHASKIE: Only if you	13	MS. DONNELLI: Counsel, I think
14	know. Don't speculate.	14	you just hinted something to the
15	A The end of 2017.	15	witness that was improper. So why
16	Q You said that William G's signature	16	don't you just object to form.
17	is below yours?	17	MR. WHO:
18	MR. CHUFF: Objection.	18	MR. PODHASKIE: This whole thing
19	Mischaracterizes the testimony.	19	is improper.
20	A I don't understand your question.	20	MR. CHUFF: No. I'm instructing
21	Q Does the signature of William G.	21	him not to answer because it's beyond
22	appear below your signature on Exhibit 35, page 3?	22	the scope of what the court ordered.
23	A My signature is above his.	23	MS. DONNELLI: Then that is
24	Q When you placed your signature on	24	probably better than instructing the
25	Exhibit 35, was Mr. G's signature already there or	25	witness how to answer.
	Exhibit 33, was Mr. as signature aircady there of		withess flow to driswer.
	Page 126		Page 128
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	not?	2	MR. CHUFF: I did not
3		3	
4	MR. CHUFF: I'm sorry. Go	4	MS. DONNELLI: An Object.
5	ahead.	5	MR. CHUFF: If you would have
	A Both of us were in a hotel lobby when		let me finish, I would have gotten
6	I asked him for loan to pay for the investigation	6	there.
7	company. At the time I signed first, and then he	7	MS. DONNELLI: I don't know what
8	signed.	8	more information you might have
9	Q So you both signed it the same day;	9	revealed.
10	is that your testimony?	10	Can you repeat the question.
11	A William and I signed on the same day.	11	(The requested portion of the
12	Q What was the name of the hotel?	12	record was read back by the
13	A Palace. That's right.	13	reporter.)
14	Q Was it here in New York City?	14	A I don't want to answer this question
15	A Yes.	15	because this has nothing to do with this case.
16	Q Does William G. live in New York	16	Q When you signed this Exhibit 35, what
17	City?	17	gave you reason to believe that William G. had
18	MR. CHUFF: Objection. Beyond	18	money to loan to Eastern Profit?
19	the scope of the deposition.	19	A Because at the time I called him, I
20	A I don't know. I had no idea where he	20	said I had a project that would need \$1 million.
21	lived.	21	I asked him if he could lend me the money. He
22	Q Was Exhibit 35 the first time you had	22	thought about it and he said okay, because at the
23	met William G. in person?	23	time we were good friends.
24	A No. I had met him before this.	24	Q You testified that you asked Mr. G to
25	Q On what occasion?	25	lend you the money. Do you mean you, Mr. Han,
		1	·
	Page 127		Page 129

1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	personally or something else?	the payment was going to come from the company
3	A On behalf of Eastern Profit.	itself since the asset was freezed. I instead
4	Q We see from the first page of	borrowed money from him.
5		borrowed money from film.
6	Exhibit 35 that it's dated December 29, 2017.	Q I thought you testined that National
7	Do you see that on the first line?	Stopped Working for Edstern Front in 2010, two
	MR. CHUFF: Objection.	years after you became director.
8	A Yes.	8 MR. CHUFF: Objection.
9	Q By December, 2017, you hadn't been a	9 Mischaracterizes the testimony.
10	director of Eastern Profit for several months;	A Who are you talking about?
11	correct?	11 Q The person who the witness, Mr. Han,
12	A Yes, that's correct.	talked about. Mr. Han, I believe you testified
13	Q So why did you believe you were in a	that Natasha worked for Eastern Profit for two
14	position to ask to borrow money for Eastern Profit	14 years.
15	at that time?	Did I remember that correctly?
16	MR. CHUFF: Objection. Asked	A I think you misunderstood my answer.
17	and answered.	Previously when I say that she had worked for the
18	MS. DONNELLI: Counsel, we	company for two years, I thought I was trying to
19	haven't even gotten into this	tell you she worked for a company during the two
20	document. How it could be asked and	years I was the director.
21	answered, I believe it couldn't have	But after that, she still helped out
22	been.	with the company's affairs.
23	MR. CHUFF: He testified to	Q Mr. Han, weren't you a director of
24	his	Eastern Profit for three years, not two?
25	MS. DONNELLI: Please stop	25 A I don't remember exactly how long.
	MS. DOMNELLI. Flease Stop	A I don't remember exactly now long.
	Page 130	Page 132
1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	testifying for the witness.	2 It was more than two years.
3	MR. CHUFF: You're trying to	³ Q I thought you also testified,
4	confuse the witness. He testified to	4 Mr. Han, that Natasha was a person who was taken
5	his authority earlier. That's all I	5 by the Chinese communist party?
6	his authority earlier. That's all I will say.	by the Chinese communist party?A Yes.
		 by the Chinese communist party? A Yes. Q So how was Natasha able to inform you
6	will say.	by the Chinese communist party?A Yes.
6 7	will say. MS. DONNELLI: Oh, because	 by the Chinese communist party? A Yes. Q So how was Natasha able to inform you
6 7 8	will say. MS. DONNELLI: Oh, because you've answered the question for him,	 by the Chinese communist party? A Yes. Q So how was Natasha able to inform you in December of 2017 that Eastern Profit needed to
6 7 8 9	will say. MS. DONNELLI: Oh, because you've answered the question for him, so you can just stop; is that it?	by the Chinese communist party? A Yes. Q So how was Natasha able to inform you in December of 2017 that Eastern Profit needed to borrow money?
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1	HAN CHUNGUANG	1	HAN CHUNGUANG
2	the terms of the loan on behalf of Eastern Profit;	2	would tell the fiscal department about this loan.
3	correct?	3	Q The fiscal department at Eastern
4	MR. CHUFF: Objection.	4	Profit or somewhere else?
5	Mischaracterizes the testimony.	5	A Of course Eastern Profit.
6	A Yes. William and I talked over the	6	Q Did you explore what the terms would
7	phone about the interest payment of 2 percent and	7	be for Eastern Profit if it borrowed the money
8	about a half year and stuff like that.	8	from someone other than Mr. G?
9	Q How about the amount of the loan, did	9	A No.
10	you negotiate that?	10	Q Why not?
11	A A million dollars.	11	A There was no reason why. Besides, if
12	THE INTERPRETER: Interpreter	12	you look at these tons, they were acquired no more
13	need to clear it with the witness.	13	in terms of Hong Kong needs market. As a matter
14		14	
15	A Yes, U.S.D.	15	of fact, if you compare the terms to other loans,
	Q When Mr. G handed you this document,		they were quite reasonable.
16	did you say to him wait, I can't sign this because	16	Q But Mr. Han, did you compare the
17	I'm no longer a director of Eastern Profit?	17	terms of any other possible loan before signing
18	MR. CHUFF: Objection.	18	this document?
19	Misleading.	19	A No.
20	A No, I did not.	20	Q Is it your testimony that you and
21	Q Did you keep a copy of this loan	21	Mr. G placed your respective signatures on this
22	agreement after you signed it that day in the	22	document on December 29, 2017?
23	hotel lobby with Mr. G?	23	MR. CHUFF: Objection. Asked
24	A No.	24	and answered.
25	Q Why not?	25	A Yes.
	Page 134		Page 136
1	HAN CHUNGUANG	1	HAN CHUNGUANG
2		2	
3	·	3	Q When you met with Mr. G to sign this
4	Q Mr. Han, you signed this document on	4	loan agreement, did you have anything to eat or
	behalf of Eastern Profit; correct?		drink with him?
5	A Yes.	5	A No.
6	Q Was any other representative of	6	MR. CHUFF: Counsel, whenever
7	Eastern Profit with you at the meeting in the	7	you get to a natural spot, can we
8	hotel lobby where you signed this loan agreement?	8	take a 5 or 10-minute break.
9	A No.	9	MS. DONNELLI: Okay.
10	Q Did you have any certainty that	10	MR. CHUFF: It doesn't have to
11	Eastern Profit, for which you've testified you	11	be right now. Just whenever you get
12	were an agent, was going to even get a copy of	12	there.
13	this loan agreement if you didn't leave that	13	MS. DONNELLI: Thank you.
14	meeting with a copy of it?	14	Q What is the status of this loan as we
15	MR. CHUFF: Objection to form.	15	sit here today?
16	A After the assets of Eastern Profit	16	A The money is still owed.
17	was freezed, this was the only one loan I made was	17	Q Has Eastern Profit made any payment
18	such a huge amount. Of course I remembered. Once	18	on this loan?
19	the asset is un-freezed, I would tell the fiscal	19	A No, because the asset continues being
20	about it. He had money, the one handle the money.	20	freezed.
21		21	MS. DONNELLI: The witness'
22		22	counsel has asked for break. We'll
23	relation to Eastern Profit?	23	
	A What I mean is that the time I	24	take a short 10-minute break.
24 25	borrowed this money on behalf of the company, of	25	(At this time, a brief recess
23	course eventually the loan has to be paid. And I		was taken.)
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		T
1	LIANI CHI INICHANIC	1 HAN CHUNGHANG
2	HAN CHUNGUANG	TIVIT CHOTGOVITG
	CONTINUED EXAMINATION	A resi
3	BY MS. DONNELLI:	³ Q Then why don't you just work out the
4	Q We are back after a short break.	⁴ Eastern Profit loan with Mr. G rather than having
5	Mr. Han, I would ask you to look at	5 Yvette do that job as you asked her to do in the
6	Exhibit 34. This is a document entitled Research	6 lobby of her building?
7	Agreement.	7 MR. CHUFF: Objection.
8	Would you agree that this is the	8 Mischaracterizes testimony.
9	research agreement for the investigative project	9 A I don't understand your question.
10	that you testified about today?	Which lobby of the building, and what did I tell
11	MR. CHUFF: Objection.	11 Yvette?
12		i vette.
13	MR. PODHASKIE: Objection.	Q Tras init a attempted to concet the
	Foundation.	lour back from Eastern Front.
14	A I have never seen this document	14 A Yes.
15	before.	Q How has he done that?
16	Q Could you turn to the last page of	A He called and he said so in
17	the document. Is that the handwritten form of	¹⁷ face-to-face meeting.
18	your name on the last page at the bottom?	¹⁸ Q Was Yvette at that meeting?
19	A Can the interpreter tell me again	19 A No.
20	what this is.	Q What did Mr. G say to you?
21	Q The name of the document, sure.	A William called me over the phone and
22	THE INTERPRETER: (Interpreter	said that it was time to pay back the loan,
23	complying)	including accrued interest.
24		micraaling accitace intercest
25	A This is not my signature.	Q What did you do with that
23	Q But does it reflect your name?	25 information?
	Page 138	Page 140
	1 age 136	1 age 140
1	HANI CHI INCI IANG	1 HAN CHINCHANC
1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	A Where?	2 A When he told me that, I say to him we
2	A Where? Q On the last page of the document.	A When he told me that, I say to him we got into some trouble. We encountered some liars.
2 3 4	A Where? Q On the last page of the document. MR. CHUFF: Can I direct him?	A When he told me that, I say to him we got into some trouble. We encountered some liars. People were trying to scam us. I definitely tell
2 3 4 5	 A Where? Q On the last page of the document. MR. CHUFF: Can I direct him? A Can you point it out to me? 	A When he told me that, I say to him we got into some trouble. We encountered some liars. People were trying to scam us. I definitely tell him that we needed more time to pay back the loan.
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1	HAN CHUNGUANG	1 HAN CHUNGUANG
2	Yvette told you that you needed to get money and	2 A No.
3		A No.
4	when you actually got the money from William G?	Q Do you know who Elanchao Hamis.
5	A Several days.	LIKI CHACHAU.
	Q Was it less than a month?	5 A Can you just repeat it again.
6	MR. CHUFF: Objection. Asked	6 Q Lianchao Han.
7	and answered.	⁷ A The way you read it, I don't think
8	A Again, I don't remember, but I think	8 so. You're not telling me. I don't know this
9	it was a month, several days later.	9 person the way you read it. The way you spell it,
10	Q What collateral did Eastern Profit	L-I-A-N-C-H-A-O. Lianchao, I don't know this
11	give for the loan?	11 person.
12	MR. PODHASKIE: Objection.	Q Do you know someone with a name
13	MR. CHUFF: Objection. Assumes	13 similar to that?
14	facts.	14 MR. CHUFF: Objection to form.
15		The Chorr. Objection to form.
16		7. Again, I don't have any impression of
17	mean?	this name:
	Q Security for the repayment of the	Q This morning I maroadeed years
18	loan.	French Wallop who is sitting to my left.
19	A Number 1, the guarantee was that when	19 A Mm-hmm.
20	the assets company was un-freezed as a result of	Q Have you ever seen Miss Wallop before
21	the investigation, I will return him the money and	21 today?
22	pay him back the loan.	A No. I don't have a memory of it.
23	Secondly, we were good friends. We	Q Did you ever prepare a meal for
24	had enough trust.	Miss Wallop and in Mr. Guo's apartment?
25	Q If you had enough trust, why isn't	25 MR. PODHASKIE: Objection. I
	Page 146	Page 148
1	HANI CHI INCI IANG	1 HAN CHUNGUANG
2	HAN CHUNGUANG	TIAN CHONGOANG
3	Yvette dealing with William G now instead of you?	404 44 5.00 5.0.
	MR. CHUFF: Objection. Form.	Willy Would I prepare a meditor her,
4	A There was no why. I give Yvette the	especially I am not even a chef.
5	full authority to take care of this matter, and	⁵ Q So it's a yes or no question. Please
6	she took care of this matter for me. That was it.	6 answer it.
7	Q Do you know the individual name Je	⁷ A No.
8	Kin Ming? J-E K-I-N M-I-N-G.	8 MR. CHUFF: Objection.
9		
9	A No.	⁹ Q I introduced you this morning to
10		Q I introduced you this morning to
	A No. Q Do you ever exchange E-mails with William G?	Q I introduced you this morning to
10	Q Do you ever exchange E-mails with	10 Mr. Michael Waller, who is sitting to the left of me.
10 11	Q Do you ever exchange E-mails with William G? A No.	10 Mr. Michael Waller, who is sitting to the left of 11 me. 12 Mr. Waller, have you ever seen
10 11 12	Q Do you ever exchange E-mails with William G? A No. Q You've never received an E-mail from	Mr. Michael Waller, who is sitting to the left of me. Mr. Waller, have you ever seen Mr. Waller before today?
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4	STATE OF NEW YORK)
5	SS:
6	COUNTY OF)
7	(COUNT OF
8	I, Han Chunguang, hereby certify that I
9	have read the transcript of my testimony taken
10	under oath in my deposition of November 11, 2019;
11	
12	that the transcript is a true and complete record
	of my testimony, and that the answers on the
13	record as given by me are true and correct.
14	
15	
16	
17	HAN CHUNGUANG
18	
19	
20	Subscribed and sworn to before me
21	This day of 2019
22	
23	(NOTARY PUBLIC)
24	(MOTAKT LODETC)
25	
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3	CERTIFICATE
4	CERTIFICATE
5	I Torri Fudono a storetimo repettor
	I, Terri Fudens, a stenotype reporter
6	and Notany Dublic within and for the State of New
	and Notary Public within and for the State of New
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